

Communication from Public

Name: Adam S. Peer, American Chemistry Council
Date Submitted: 04/27/2022 11:38 AM
Council File No: 21-0064
Comments for Public Posting: See attached letter.

27 April 2022

Electronic Delivery

Honorable Nury Martinez, President and
Members, City Council
City of Los Angeles,
State of California
Room 340, City Hall
200 N Spring St,
Los Angeles, CA 90012

**In re: Opposing Motion 21-0064 directing drafting of an ordinance banning
expanded polystyrene products**

Dear President Martinez and Members,

On behalf of the American Chemistry Council (ACC), thank you for this opportunity to provide comments to this motion that, among other things, directs the drafting of an ordinance banning expanded polystyrene products. ACC is a national trade association representing chemicals and plastics manufacturers in the United States, including companies in California.

ACC and our members are deeply committed to creating a circular economy for plastics. That is why ACC and its plastic members were among the first to establish ambitious, forward-thinking goals that all plastic packaging in the United States is reused, recycled, or recovered by 2040 and that all U.S. plastic packaging is recyclable or recoverable by 2030.¹ Achieving these goals will require manufacturers, brands and retailers, recyclers, and waste haulers, as well as citizens, communities, non-profits, academics, and federal, state and local governments to come together to support policies and programs to increase the supply of and demand for recycled materials and create the circular economy we all want.

This proposal will increase landfilled waste. The items potentially banned by an ordinance typically weigh less than alternative materials.² It is unlikely the city has the required infrastructure to process alternative materials. In all likelihood, that means that more material will be landfilled, not less.

¹ Plastic Division, "U.S. Plastics Resin Producers Set Circular Economy Goals to Recycle or Recover 100% of Plastic Packaging by 2040," Media release (American Chemistry Council, May 9, 2018), <https://perma.cc/9F9K-KBG8>.

² Demetra A. Tsiamis, Melissa Torres, and Marco J. Castaldi, "Role of Plastics in Decoupling Municipal Solid Waste and Economic Growth in the U.S.," *Waste Management* 77 (July 2018): 147–55, <https://doi.org/10.1016/j.wasman.2018.05.003>; Richard Lord, "Plastics and Sustainability: A Valuation of Environmental Benefits, Costs, and Opportunities for Continuous Improvement" (American Chemistry Council, July 2016), <https://perma.cc/6PX6-MPUW>.



This proposal will increase costs to the city. A recent study found that a *more limited* ban in Virginia would nearly double state costs on foodservice products for affected state agencies.³ It is likely the city would also see increased public costs. Other studies found similar impacts.⁴

This proposal is unlikely to lead to litter reduction. The Honolulu City Auditor concluded that “PS [polystyrene] bans do not reduce litter”.⁵ Furthermore, the California State Water Resources Control Board noted that mere substitution due to a ban would not result in reduced waste.⁶

ACC supports a sustainable alternative to bans and restrictions. Instead of a ban with little benefits, ACC believes that the entire value chain from materials producers, converters, brands and retailers, waste and recyclers and government have a role to play in facilitating recycling of packaging and that more resources are needed in the system to create the circular economy we all want. A well-designed system should:

- Increase access to recycling and modernize the collection of all materials.
- Encourage the use of packaging materials with better environmental performance.
- Encourage innovation in recycling technologies via the private and public sectors to ensure more used plastic is reused instead of disposed of.
- Develop new circular markets for recycled plastics by building recycling infrastructure and collaboratively developing circular markets for recycled plastics in the U.S. spirit of competition and free markets.

Again, thank you for this opportunity to provide this information to the council. If you have any questions, please feel free to contact Tim Shestek, ACC’s Senior Director, Western Region at (916) 448-2581 or Tim_Shestek@AmericanChemistry.com.

Sincerely,



Adam S. Peer, Senior Director
American Chemistry Council

³ MB Public Affairs, Inc., “Initial Comments on Virginia Executive Order Number 77 (2021),” April 4, 2021.

⁴ Michael MB Public Affairs, Inc., “Fiscal Impacts of Prohibiting Expanded Polystyrene Food Service Products in Maryland: SB 186 & HB 229,” Industry report, 2017, <https://perma.cc/6LC9-YR5A>.

⁵ City Auditor, “Single-Use Polystyrene Food Containers and Plastic Bag Study,” Government report (Honolulu, HI US: City and County of Honolulu, December 2018), <https://perma.cc/C65F-YWF4>.

⁶ California State Water Resources Control Board, “Amendment to the Water Quality Control Plan for the Ocean Waters of California to Control Trash and Part 1 Trash Provisions of the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California” (Sacramento, CA US: State of California, Environmental Protection Agency, April 7, 2015), <https://perma.cc/C5DF-2NMR>.

Communication from Public

Name: Andy Hattala

Date Submitted: 04/27/2022 06:15 AM

Council File No: 21-0064

Comments for Public Posting: As Co-Chair of and on behalf of Climate Reality Los Angeles, we fervently support council file 21-0064. We appreciate the waste reduction report compiled by L.A. Sanitation and endorse the recommendations put forward. We specifically support: a drastic reduction if not elimination of single-use plastics, a complete polystyrene ban, a complete plastic bag ban and beyond to achieve zero waste. We believe City departments should lead the way in implementing and demonstrating the feasibility of zero waste practices. It is imperative that the City of Los Angeles and the people of Los Angeles do everything in their power to establish a sustainable, zero waste society. The future demands and depends upon such transformations.

Communication from Public

Name: Lendi Slover

Date Submitted: 04/27/2022 07:49 AM

Council File No: 21-0064

Comments for Public Posting: Dear LA City Council Members, Los Angeles is drowning in waste. Everywhere you look trash is overflowing waste bins, littering streets, and making its way to our oceans harming land and marine mammals. I appreciate LA City's aggressive and straightforward approach to not only reducing waste but to preventing waste with zero waste facilities and events and only selling reusable water bottles and implementing hydration stations. This will also reduce the traffic, noise and pollution associated with hauling so much waste. Council file No. 21-0064 will truly make LA City a better place to live, work and visit so we can all sing "I Love LA" and mean it.

Draft Message for public comment!

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Sincerely,

Communication from Public

Name: Sharon Ungersma

Date Submitted: 04/27/2022 08:38 AM

Council File No: 21-0064

Comments for Public Posting: I fully support Council file 21-0064. We understand the damage that single-use plastics are doing to our environment, and we need to eliminate their use, as well as banning polystyrene. LA city departments should lead the way in demonstrating zero waste practices for LA residents in their daily practices and at city events. We all know that single-use plastic bags are a damaging convenience, but only a complete ban will get businesses to stop handing them out.

Communication from Public

Name:

Date Submitted: 04/27/2022 08:48 AM

Council File No: 21-0064

Comments for Public Posting: Single use plastics are the highest polluters of our environment.
This is a good effort to reduce the plastic pollution.

Communication from Public

Name: Tara Barauskas

Date Submitted: 04/27/2022 09:13 AM

Council File No: 21-0064

Comments for Public Posting: As a community member who cares about the climate, I urge you to support this motion and ban polysterene and single-use plastics. Our community is choking with plastic pollution and we need to take bold steps to live more cleanly and sustainably. Single-use plastics are not necessary to function and need to be eliminated. City events should all be zero-waste to show the community the City's commitment to sustainability. Thank you.

Communication from Public

Name: Lendi Slover

Date Submitted: 04/27/2022 12:01 AM

Council File No: 21-0064

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Sincerely,

Communication from Public

Name: Joe Boston

Date Submitted: 04/27/2022 12:04 AM

Council File No: 21-0064

Comments for Public Posting: I support the council file 21-0064. As an LA county resident, I want to live in a city that does not pollute and therefore believe single-use plastics should be eliminated. I support a complete polystyrene ban. City departments should lead the way in demonstrating zero waste practices. City events should be required to have zero waste practices. Single-use plastic bags should not be allowed.

Communication from Public

Name: Analisa Swan

Date Submitted: 04/27/2022 05:46 AM

Council File No: 21-0064

Comments for Public Posting: Please support passage of Foodware Accessories Upon Request / Disposable Foodware Accessories / Small Business Commission / Food Service Providers / Zero-Use Trash. We need to reduce single use plastics and increase zero waste facilities! Please act now for a cleaner tomorrow. Thank you for your courtesy and consideration of this important matter.