Connecticut Joint Standing Committee on Environment and Natural Resources
March 11, 2019

CT SB 229– *AN ACT PROHIBITNG THE USE OF STYROFOAM TRAYS IN CONNECTICUT SCHOOLS* **– OPPOSE**

CT HB 5384- *AN ACT REQUIRING THE ELIMINATION OF SINGLE-USE STYROFOAM CONTAINERS* **-OPPOSE**

The American Chemistry Council (ACC) is a national trade association representing the chemical and plastics industries including member companies in the State of Connecticut. These companies are responsible for the creation of more than 7500 direct jobs; 4095 related jobs; and an additional 5635 jobs in plastics and rubber. They also generate $934 million in payroll and contribute $111 million in state and local taxes.

ACC and its members are committed to the safety of our products, the protection of public health and the sustainability of our environment. More specifically, we strongly support efforts to reduce litter and minimize solid waste.

In recent years, momentum has grown behind product bans including single-use plastic and polystyrene foam food service products, despite their functionality and the importance of plastics to society. Plastics help keep the foods we eat and serve our families safer and fresher than ever before. In addition to efficiency and functionality, the plastics industry strengthens our economy by employing nearly 1 million people nationwide.

Although plastics provide important benefits for modern life, plastics, polystyrene and other trash should not be littered and should not end up in our waterways. Several cities and states have proposed bans on safe products like polystyrene foam food service products as a way to solve the litter or waste problem. We know from experience that bans do not fix these issues, and merely substituting one type of food service product for another will not result in any environmental improvement. We also know that there is a fiscal impact on banning polystyrene and mandating the use of alternative products.

Instead of a ban on polystyrene, we support the concept of litter education and prevention, waste minimization and recycling. Our industry has been a champion of these programs nationwide and in the State of Connecticut.

<u>Efforts to Control Litter, Recycle Materials, Reduce Waste and Conserve Resources</u>
ACC and its members have a long history of investing in and supporting recycling. Through its Flexible Film Recycling Group (FFRG), ACC in 2016 began a partnership with the Connecticut Department of Energy and Environmental Protection to implement **Wrap Recycling Action Program** (WRAP). This initiative aims to increase opportunities for residents and businesses to recycle flexible plastic film including consumer and commercial product wrap; bags for groceries, produce and bread; and other common items like food storage bags and shipping pillows. Recycled film can be used to manufacture products such as durable outdoor lumber for decks and fences, and new packaging materials.

Connecticut's program built on best practices and lessons learned in previous WRAP campaigns in other states. The WRAP campaigns leverage the existing recycling infrastructure for plastic film packaging, which includes more than 20,000 drop-off locations across the country, predominately at major grocery and retail stores.

Connecticut's campaign focused on the greater Hartford area. Following months of outreach, audits of material collected at retail stores found:

- an 11 percent increase in the amount of plastic bags collected[1];
- a seven percent increase in the amount of "other film" collected[2]; and
- a 23 percent decrease in non-film packaging "contamination."

A post-campaign survey of adults in the greater Hartford area found:

- a nine percent increase in respondents who heard about how to recycle flexible plastics at grocery stores (63 percent versus 54 percent);
- significant increases in those who said they knew which items to take back to stores (e.g., plastic bags: 15 percentage points increase, plastic bread bags: 17 points, plastic newspaper bags: 13 points); and
- a 10 percent increase in those who said they take plastic film packaging back to stores either "most of the time" or "always/all of the time" (40 percent versus 30 percent).

In addition, ACC has sponsored several other projects in the Northeast including **Save the Bay Narragansett Clean Up Day; Green Up Day in Vermont;** and **Northeast Recycling Council (NERC)** conferences.

Our membership increasingly embraces sustainability and recognizes consumers' desire to recycle, and we welcome additional opportunities to pursue waste management programs, recycling initiatives and marine debris clean ups in Connecticut. In recent years, ACC has ramped up engagement and leadership in national and international programs with these goals. For example, ACC participates in the following:

- Co-Leader of **Operation Clean Sweep**, which helps makers, shippers and users of plastic pellets to contain and prevent them from entering the ocean and waterways
- Founding partner of **The Recycling Partnership**, a national recycling nonprofit dedicated to improving curbside recycling
- Founding partner and sponsor of **Keep America Beautiful "I Want to Be Recycled"** campaign to increase consumer awareness and participation in recycling
- Supporter of **Closed Loop Ocean**, designed to fund waste infrastructure solutions in Southeast Asia
- Member of **Trash Free Seas** with the goal of advancing scientific rigor on marine debris, exploring solutions and increasing public understanding

[1] E.g., grocery, retail, and produce bags only
[2] E.g., case wrap, product overwrap, bread bags, newspaper bags, etc.

Fiscal Impacts on the State of Connecticut, Taxpayers and Consumers

A ban on polystyrene would have significant fiscal impacts on the state, taxpayers and consumer as it would effectively mandate the use of alternatives. A recent fiscal impacts study of found that a ban would raise procurement costs by an additional $1.4 million. Schools spent an estimated $1.7 million on polystyrene foodservice products in FY '18, and the cost of alternatives would be $3.1 million (Fiscal Impacts on CT Study, Table 11: Estimated Annual Procurement Costs, p. 30).[3]

Replacing polystyrene with an alternative food service product would require an average cost increase of 82%. In other words, for every $1 spent on polystyrene foam foodservice ware, the State of Connecticut will have to spend at least $1.82 on the alternative replacements (biodegradable, compostable, coated paperboard), effectively doubling the costs to businesses and consumers. Independent price lists show the cost of paper and compostable product alternative to expanded polystyrene foam (cups, trays, and dinnerware) would range from 2-4 times more than expanded polystyrene foam (Fiscal Impacts on CT Study, p. 14).

New regulations like the proposed ban on polystyrene in schools would increase overall school costs and therefore would impact or reduce funding available for other educational purposes.

Environmental Footprint

Contrary to widespread belief, alternatives to polystyrene products, will not result in the use of more environmentally "friendly" products. All packaging leaves an environmental footprint regardless of the material type. The end of the product's lifecycle is not the only consideration – the environmental footprint of any product includes all of its impacts, such as raw materials and the energy to produce, transport, and recover or dispose of any material.

We respectfully urge you to consider the following when measuring impacts of the entire lifecycle of a product:

- **Energy Use:** A polystyrene cup requires about 50% LESS energy to produce than a similar plastic-coated paperboard cup with a corrugated cup sleeve and creates fewer greenhouse gas emissions than a similar coated paper based cup with corrugated sleeve. Lower weight products such as polystyrene foam products composed of more than 90% air generally produce smaller environmental burdens.
- **Solid Waste:** Polystyrene foam products create significantly less solid waste than alternatives—up to five times less weight paperboard or other similar products.
- **Greenhouse gases**: Studies conducted by Seattle Public Utilities (SPU) showed banning polystyrene foodservice products would increase environmental impacts by doubling greenhouse gas emissions, energy use, and waste. If paperboard products do not degrade after disposal, they store carbon and generate fewer greenhouse gas emissions than polystyrene foam foodservice produces; however, if paperboard product degrade to the maximum extent, they generate more greenhouse gas emissions than polystyrene foam products, so comparison of greenhouse gas emissions vary widely depending

[3] Fiscal Impacts, Proposed Connecticut Ban on Polystyrene Foam Food Service Products, MB Public Affairs, March 2019.

on assumptions about the degradation of paperboard products. Lastly, because polystyrene is usually purchased near its place of use, as opposed to alternatives such as bamboo, there are fewer emissions when transporting products.

"Biodegradable" Alternatives

The amount of polystyrene foodservice products that makes up the typical solid waste stream is very small- about 1.5% of overall waste in surveys conducted in the US and Canada, whereas paper and paperboard make up the largest amount of solid waste in landfills at 28% of waste generated. ACC shares your concerns about waste, but banning one material does not reduce litter. The City of San Francisco banned polystyrene, but according to a 2008 litter audit, paper cup litter increased after the bans. Bans result in litter substitution, not elimination, likely because people believe they are littering "biodegradable" containers.

Notably, "biodegradable" containers do not disappear as litter or degrade in landfills. They only biodegrade in a controlled composting environment—a large industrial facility where temperatures exceed 140 days for several degrees. They do not degrade if littered along a road, deposited in a trash can nor if they make their way into a storm drain.

Food Safety

Polystyrene food service products are safe, low cost, and efficient packaging products that have been approved for use by the US FDA for more than fifty years. Polystyrene has performance benefits of helping food maintain temperature, preventing the growth of bacteria and spread of food borne illness, and offering a sanitary way to serve fresh food.

Polystyrene often can be confused with styrene, and health experts and government agencies have stated that levels of styrene pose no risk to consumers. It's important to know the differences between styrene and polystyrene. Styrene is a liquid that can be chemically linked to create polystyrene. Polystyrene is a solid inert plastic that can be used to make many products including disposable cups, plates and other foodservice products.

Funding for Polystyrene Recycling Programs

As part of a comprehensive plan to address and minimize waste, ACC supports polystyrene foam recycling programs such as the Foam Recycling Coalition (FRC). Launched in 2014, FRC was created to support increased recycling of foodservice packaging made from foam polystyrene. In order to meet this objective, the FRC shares general information on foam recycling, provides technical resources and offers funding assistance to programs ready to start or strengthen post-consumer foam recycling.

In addition to encouraging the recycling of foam foodservice packaging (i.e. cups, plates, bowls, clamshells and cafeteria trays), the efforts of the FRC also extend to other foam food packaging like egg cartons and meat trays. FRC has supported dozens of grant funded programs across the US and Canada since it launched in 2014. The grants, each valued up to $50,000, assist in equipment upgrades that add or expand recycling of post-consumer foam polystyrene.

The foodservice industry through its Foam Recycling Coalition's launched a new grant program this year to help fund infrastructure for the collection, processing and marketing of products made for polystyrene foam (www.fpi.org/recyclefoam). The grant program targets post-consumer polystyrene foam products such as

foodservice packaging (i.e., cups, plates, bowls, clamshells, cafeteria trays); egg cartons; meat rays; and protective “transport” packaging.

The 2019 foam recycling grant cycle opens June 1. Applicants may submit their applications and supporting documentation through July 31. The FRC grant award committee will review and rank the applications, notifying grant awards in September. More information is available at:
https://www.recyclefoam.org/grants

SUMMARY

In summary, ACC and ACC’s Plastic Food Packaging Group and the Plastics (PFPG) Division have demonstrated a strong commitment to working with industry and government to find a sustainable solution to the litter problem and to improve our environment through recycling, reusing and recovering plastics including polystyrene.

Respectfully submitted,

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