

January 27, 2022

Rep. David A. Bennett, Chair
Rep. Robert D. Phillips, Vice Chair
Rep. William W. O'Brien, Vice Chair
House Environment and Natural Resources Committee
Rhode Island General Assembly
82 Smith Street
Providence, RI 02903

RE: H 7065 "Plastic Waste Reduction Act"

Chair Bennett, Vice Chair Phillips, Vice Chair O'Brien, and members of the committee:

On behalf of the American Recyclable Plastic Bag Alliance (ARPBA), which represents U.S. plastic bag manufacturers and recyclers, I write to share our concerns regarding H 7065 and its potential to ban recyclable plastic bags statewide, unleash expensive burdens on small businesses, drive up grocery bills for consumers, and undermine American manufacturing jobs.

While ARPBA understands Rhode Island's interest in promoting sustainability through public policy, the definition of reusable bag in H 7065 will undermine these goals. This bill's requirement that reusable carryout bags have "handles which are stitched" will force retailers and consumers to switch to alternative bags imported from foreign manufacturers based in some of the world's worst polluting countries. Although H 7065 is billed as a "plastic bag ban", the stitched handle bags it mandates are predominantly made from plastics like woven and nonwoven polypropylene, nylon, or polyester.

Lifecycle assessments of carryout bags indicate that compared to the traditional plastic bag, the stitched handle plastic bags mandated by H 7065 require significantly more reuses to offset their larger environmental impacts, stemming from the increased energy, resources, and emissions generated by their production, manufacture, and transport. Other reusable bags have even worse profiles. [New York Times reporting revealed](#) that organic cotton totes require 20,000 reuses to offset their environmental impact.

Furthermore, research conducted by Clemson University indicates that consumers rarely reuse these alternative products enough times to offset their environmental impact. Whether or not they are reused sufficiently, these stitched handle plastic bags [cannot be recycled anywhere in the state](#), according to the Rhode Island Resource Recovery Corporation. Ultimately, H 7065 bans recyclable plastic bags in favor of nonrecyclable stitched handle plastic bags.

If the committee remains committed to moving forward with plastic bag policy, we suggest considering an alternative approach, like amending the bill to define reusable bags based on the model plastic bag legislative language in the Rhode Island Taskforce to Tackle Plastics' [final report](#). The report follows the lead of many other jurisdictions to allow reusable plastic film bags—which are independently certified to be as durable as other types of reusables and referenced in the current bill.

Importantly, mandating stitched handles does not necessarily make a bag more durable. California established the first statewide definition for a reusable plastic bag based on scientific testing: 2.25 mils in thickness and capable of 125 or more uses carrying 22 or more pounds over a distance of at least 175 feet. Reusable plastic film bags are allowed under statewide bag bans all over the country, including in California, Washington, Oregon, Maine, and Connecticut.

In the midst of near-record inflation and ongoing supply chain issues, incorporating the Taskforce's recommended language to include additional carryout bag options is an alternative approach that could help Rhode Island avoid the unintended consequences that bag bans unleash on small businesses and consumers.

For many struggling consumers, H 7065 would create significant new costs at checkout when they forget their bags, which may be more likely for those who rely on public transit, work multiple jobs, or otherwise face challenges when it comes to shopping for necessities. Whether it's a \$10 cotton or canvas bag or a \$1-2 stitched handles plastic bag, like the kind commonly available at the checkout counter, these costs can add up quickly in the absence of affordable options for businesses and consumers.

Businesses across the country are struggling with similar pressures. Retailers in Washington State report they continue to [struggle to find alternative, compliant bags](#) at prices they can afford. Moving forward with H 7065 risks bringing these same challenges down on Rhode Island small businesses, given the [well-documented nationwide shortage of both paper bags and reusable bags](#), which is anticipated to [last for several years](#).

As challenges mount for retailers, communities are acting. Logan, Utah [repealed its bag ban](#) and North Myrtle Beach, South Carolina [delayed its ban](#). At the same time, New York has [all but given up trying to enforce](#) its carryout bag ban in New York City. Recent [reporting from Philadelphia](#) found that many businesses are struggling to comply, driving the City Council to consider revisiting the issue. Pittsburgh, which was prepared to pass a bag ban at the end of 2021, followed suit, slowing down their process to explore alternative options.

ARPBA and its members stand ready to work with you on solutions that protect the state's unique environment, increase recycling, decrease litter and waste, and reduce marine debris without placing a burden on residents or the business community or undermining American manufacturing.

As you work through this process, please consider us a resource, and don't hesitate to reach out with any questions.

Sincerely,



Zachary Taylor
Director

American Recyclable Plastic Bag Alliance

CC: Rep. Lauren H. Carson
Rep. Terri-Denise Cortvriend
Rep. Barbara Ann Fenton-Fung
Rep. Kathleen A. Fogarty
Rep. Arthur Handy
Rep. Jason Knight
Rep. Alex Marszalkowski
Rep. Carol Hagan McEntee
Rep. James N. McLaughlin
Rep. Patricia L. Morgan
Rep. Marcia R. Ranglin-Vassell
Rep. June Speakman