

*To promote conservation of environmental resources,  
provide education, and advocate for environmentally  
responsible actions.*

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Shanika Garrett  
Office of Senator Malone  
Re: Plastic Bag Ban

June 28, 2011

Shanika,

Thank you for the American Samoa plastic bag ban act. I read it and a bill that has been presented before the California legislature three times and failed to pass. I think the American Samoa act is poorly conceived, would present an undue hardship on both retailers and customers; and would have limited or possibly no net benefit to the environment beyond reduction of litter and protection of sea life. I do not wish in any way to under value the benefits of reducing litter or safeguarding sea turtles or other marine life. But measuring benefits in terms of air and water pollution, climate change, and energy use, the American Samoa Act is not a good model, nor is it a good fit for the USVI.

We should not draft legislation that promotes use of paper bags as an alternative to disposable plastic check-out bags. Why not?<sup>1</sup>

- It takes over four times as much energy to manufacture a disposable paper bag as a disposable (HDPE) plastic bag
- Production of paper bags generates 70% more air pollution than HDPE plastic bags
- Production of paper bags generates 50 times more water pollution than HDPE plastic bags
- It takes 98% less energy to recycle a pound of plastic than a pound of paper
- Paper bags cost the retailer over 5 cents each -- over 4 times the cost of HDPE plastic bags. Increased costs of purchase, shipping and storage would be passed on to the general public.

While we should provide incentives for use of reusable bags, we should not provide extra incentives or encourage use of "natural" cotton or canvas bags, over other reusable bags [such as polypropylene (PP) or low-density polyethylene (LDPE) plastic bags]. Why not?

- Re-used 5 times, the carbon footprint of a reusable PP bag is equal to that of double-bagged disposable HDPE bags. The average customer re-uses a reusable shopping bag 51 times before retiring it. So we get an average of 46 "carbon FREE" uses of the PP bag relative to double-bagged disposable bags.
- A canvas bag would have to be reused 65 times before equaling the double-bagged plastic bag's carbon footprint. That is above the 51x average reuse, so given average use we never reach the point where canvas is better than disposable plastic on the basis of water pollution, air pollution or carbon footprint (not accounting for impacts on turtles and roadside litter).

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<sup>1</sup> Stats from attached Washington Post article and UK Environment Agency study

A ban on disposable plastic bags would have to exempt certain bags – like the ones on a roll in the fresh produce section. To be equitable, the ban would have to cover small, not just the big supermarkets. And we would have to have a superior system in place for customers to carry groceries or items out of a store.

To be truly effective, a program to replace disposable bags must be widespread and supported by the community. A more gradual evolution toward eliminating disposable plastic bags through a combination of education, marketing and incentives (positive and negative) appears to be more feasible, enforceable, and less of a financial hardship on VI consumers than a legislated ban. We recommend the following components to a Plastic Bag Use Reduction Bill:

1. a significant public education campaign to be managed by VIWMA or their grantees or contractors, and be paid for from fees held in the Anti-Litter and Beautification Fund. The campaign would:
  - a. promote reuse of reusable shopping bags in TV, radio and print ads;
  - b. provide goodwill advertising of participating retailers in TV, radio and print ads;
  - c. (possibly) subsidize cost of reusable bags; and
  - d. Encourage involvement of schools and non-profits in a public education campaign.
2. participating retailers would be required to<sup>2</sup>:
  - a. provide reusable shopping bags for sale at reasonable cost;
  - b. be required to aggressively promote use of reusable bags;
  - c. offer a meaningful cash incentive at the checkout counter for people to exclusively use reusable shopping bags, boxes or baskets;
  - d. charge a minimum five cent (\$0.05) cost per disposable plastic bag used; and
  - e. report disposable plastic bag purchases and reusable bag sales quarterly to VIWMA so that the program's success (or failure) is measurable.
3. VIWMA to evaluate the program after three (3) years in a report to the Legislature; and the Legislature to revisit the need for a total ban on disposable HDPE plastic bags if education/ outreach and market-place incentives have failed to significantly reduce HDPE plastic bag use.

I look forward to speaking further with you and Senator Malone about this initiative.

Yours,

*Paul*

Paul Chakroff  
Executive Director

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<sup>2</sup> Notes:

- a. I suggest under \$2.00 each
- b. The cash incentive may take the form of a (not less than) 1% discount on qualified purchases similar to the 5% discount offered by Plaza Extra to Sr. citizens and veterans
- c. Double-bagged, the cost would be ten cents (\$0.10) per carry unit. Income from this charge would
  - i.) cover the cost of the bag (<\$0.02); and
  - ii.) subsidize the cash incentive paid to customers reusing bags.
- d. No payments would be collected from the retailer or paid to the retailer. The (+/-) incentive program would be fiscally self-sustaining.