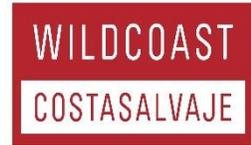




San Diego
County Chapter



5GYRES
SCIENCE TO SOLUTIONS



July 9th, 2018

San Diego Mayor and City Council

Re: Support for a Ban on Polystyrene Foam and Restrictions on Single Use Plastics

Dear Honorable Mayor Faulconer and City Council Members,

We, the undersigned, strongly support and encourage you to move forward with developing and approving an ordinance restricting the sale and distribution of expanded polystyrene (EPS) products for the use of food service ware, fish and meat trays, egg cartons, coolers, and beach toys in the City of San Diego. We also support including a provision for to-go utensils and straws only upon request, and when requested, only biodegradable straws be provided. The evidence is overwhelmingly clear; for the well-being of human health, our environment, wildlife, and our economy, it is time for San Diego to join 116 other California jurisdictions and adopt a proven policy to phase out EPS.

Expanded polystyrene poses human health risks that can't be eliminated by voluntary efforts alone. These plastic products are made from styrene, a known animal carcinogen that was found "reasonably anticipated to be a human carcinogen," in a congressionally mandated, science-based, public health document prepared by the National Toxicology Program. The International Agency for Research on Cancer also supported this claim, stating that EPS is "probably carcinogenic to humans." It was also listed as a carcinogen under California's Proposition 65 in 2016.

The EPA ranks polystyrene manufacturing as the fifth worst global industry in terms of hazardous waste creation. Additionally, styrene is derived from petroleum or natural gas. The extraction and use of fossil fuels to create EPS has a direct impact on climate change through increased greenhouse gas emissions. Additionally, the process of manufacturing EPS is energy intensive, causing additional greenhouse gas emissions. An estimated 8% of global petroleum consumption is used to make and manufacture plastics. Replacing EPS with more sustainable alternatives not derived from fossil fuels will lead to a reduction in greenhouse gas emissions.

Like other non-biodegradable single-use plastics, EPS foam is a primary contributor to the pollution in our environment. It is often the most abundant item counted in our environment, largely because of its ability to fragment into smaller pieces. In San Diego County, volunteers removed 12,575 pieces of polystyrene from our beaches in 2017. It often escapes the waste stream and makes its way into storm drains, waterways, and ultimately our ocean. Its ubiquity, durability, and ability to accumulate high levels of persistent pollutants make degraded EPS products harmful.

Research shows that EPS debris can be a vector for toxic chemicals in the marine environment. Once there, sunlight and currents degrade plastic debris into smaller particles called microplastics, which absorb and concentrate toxic chemicals up the marine food chain and into our bodies. A University of California, Davis study found that a quarter of all fish sampled in California stores had trace amounts of plastics. From plankton to fish, and to humans that eat seafood, plastic pollution is changing the very chemistry of life.

The combination of toxic chemicals in manufacturing, its persistence in the environment, and the potential to deliver toxic chemicals to marine life, and up the food chain to humans, all point to the need to eliminate EPS. Only a ban on EPS products will eliminate the public health risk.

Some claim that businesses will suffer with an EPS ban, but the fact is that in the 116 California jurisdictions that have passed an EPS reduction ordinance, restaurants have seen negligible impact. Approximately 120 restaurants in Surfrider San Diego's Ocean Friendly Restaurant program have eliminated EPS food ware with no reported negative impact on their bottom line. Moreover, the impact of having cleaner beaches and a clean ocean is of paramount concern. San Diego is a vacation destination, primarily because of our coastal resources, but the aesthetic degradation of our beaches from EPS litter can have a much greater impact on tourism, a \$10 billion industry, than the overstated dangers to the restaurant industry.

The City of San Diego's current alternative, the curbside recycling program for EPS food ware, is an inadequate solution. The City contracted HF&H Consultants to determine the viability and potential efficacy of this program. HF&H's report made it clear that due to food contamination, cleaning costs, and the products' lightweight, recycling facilities often do not separate and recycle EPS food ware containers. The City of Los Angeles's Project Manager was interviewed and indicated that EPS food service containers that are collected are "often contaminated, and therefore not recycled."

San Diego taxpayers are currently paying approximately \$90,000 annually for EPS food ware items to be hauled out of San Diego County under the guise that they are being recycled, only for the large majority of them to end up in a landfill. The San Diego City Council adopted a waste diversion plan of 75% waste by 2020, 90% by 2035 and 100% by 2040. Diverting EPS food ware to a landfill outside of San Diego does not help achieve these results. To meet these goals and reduce taxpayers' costs, polystyrene food ware needs to be eliminated. Furthermore, recycling a fraction of EPS food ware containers does nothing to address the litter problem, the impact on wildlife, and the potential human health impacts. While we support continuing to recycle EPS packaging, recycling EPS food ware is clearly not the answer.

While education and outreach efforts are helpful, they do not have the same impact as public policy. We encourage San Diego to move forward with passing an EPS foam ordinance and join cities across the world in banning this harmful marine and coastal resource pollutant. We encourage San Diego to follow the lead of many others and pass a broad polystyrene ordinance that encompasses not only food service ware, but also includes non-encapsulated EPS foam for retail sale such as coolers, cups and plates. Additionally, we ask that you prohibit EPS foam items being brought to beaches and parks.

Plastic pollution is a global problem with local solutions. For the sake of human health, our environment, marine life, and economic well-being, we urge you to adopt an EPS food ware ban.

Sincerely,

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