

President Joseph Doss
Vice President Robert R. Hirst
And the Board of Directors
International Bottle Water Association
1700 Diagonal Road, Suite 650
Alexandria, VA 22314

July 11, 2017

Dear President Doss, Vice President Hirst, and Members of the International Bottle Water Association:

We are following up on our demonstration outside IBWA offices on May 8, 2017. Thirty demonstrators, representing multiple civic partner organizations, participated in our first Trash Day of Action. Virginia Delegate Paul Krizek participated, while Virginia Senators Scott Surovell and Adam Ebbin helped publicize the event. Participating organizations included the Friends of Accotink Creek, Friends of Dyke Marsh, Friends of Huntley Meadows, Friends of Lake Accotink Park, Friends of Little Hunting Creek, Arlingtonians for a Clean Environment, Clean Water Action, and the Sierra Club (Great Falls and Mount Vernon Groups), who have teamed up to form the Northern Virginia Trash Action Work Force (<https://www.facebook.com/novatawf/>). Most of these organizations conduct cleanups each year, and we are sick and tired of picking up litter and trash from our local streams and the Potomac River.

When we met with President Doss and Vice President Kirst in April, you asked why we selected IBWA as the focus of our initial efforts. The main reason is that water bottles account for a large fraction of the litter we pick up each year. Please do not think that you are alone. We object to all the other sources of litter as well and we have and will continue to act to stop it before it gets into our streams, rather than retrieve it after the fact.

On May 8, we handed out flyers and reusable water bottles at the King Street Metro station. We found many commuters who joined us in objecting to water bottles littering the landscape. We hope you saw our water bottle-themed costumes and hats as well as the pickup truck filled with recovered water bottles parked outside your building. All the bottles were picked up this spring by the Friends of Little Hunting Creek and Friends of Accotink Creek. At just a few sites we tried to determine whether our volunteers were willing and able to sort out water bottles from the rest of the trash. Separating the water bottles turned out to be feasible, and we displayed them at the demonstration. We are tempted to sort the water bottle litter we collect at all 16 sites during next year's spring cleanup and leave it with you to dispose of. The temptation arises from our conviction that the responsibility to ensure that water bottle waste is disposed of properly belongs to the manufacturers and consumers of water bottles, not to friends of our waterways.

Besides, we are concerned that you may not fully appreciate the quantity of water bottles that litter our waterways. In our past communications and in your May 8 press release, you seemed skeptical that water bottle litter is all that significant. Perhaps if you see and experience the quantity of water bottles that we collect every year, you'll appreciate the large volume of trash they represent. You and your staff are invited to join the 200 or so volunteers at our spring cleanup and see for yourselves. Or, shall we bring the bottles to you? The parade of trucks that it would take to contain all the water bottles we find would just represent the water bottle litter collected from only two small streams out of 100,000 streams and rivers in the Chesapeake Bay watershed. Or, perhaps you would be persuaded by photos of past cleanups (see, e.g., <http://www.folhc.org/news/results2016.htm>).

Please stop minimizing the significance and quantity of water bottle litter in your public communications and your communications with us. We suspect the statistics you cite are based on weight, rather than volume, and as you proudly state, water bottles are very light. Minimizing the significance of water bottle litter only makes us want to demonstrate to you more convincingly and dramatically what an enormous volume of litter water bottles represent.

We appreciated meeting with President Doss and Vice President Kirst in April. We wholeheartedly agree that recycling is a good thing, and we fully support anything you can do to improve the rate of recycling and reuse of recycled materials in water bottles. You generously solicited our suggestions to help reduce bottle litter, and in response we offered two modest requests:

1. Urge your member companies to display a more prominent message on water bottles that says, "Recycle me!" or some other pro-recycling, anti-litter message, and
2. Send an IBWA will be held sometime in November.

We also appreciate the concern you express about the environment in your May 8 press release, at <http://www.bottledwater.org/bottled-water-companies-are-concerned-about-environment-and-are-working-increase-recycling>. We are glad to hear that you have reached out to the Fairfax County Waste Management Division and the Fairfax County Public Schools to find ways your industry can improve consumer education and recycling. We urge similar outreach to the City of Alexandria and Arlington County. We look forward to hearing more about these initiatives.

Unfortunately, although we agree with you on the importance of recycling, a strong recycling program doesn't solve the litter problem. All local jurisdictions have strong and effective curbside recycling programs, with high rates of public participation. Nonetheless, the litter is overwhelming. Curbside recycling may be necessary, but it's not sufficient to address the litter problem.

We've had a chance to read IBWA's Materials Recovery Plan (9/28/2012). We appreciate your commitment to corporate responsibility, but we are unsure how the proposed co-op would actually reduce litter. It seems cumbersome and bureaucratic, and to require that a program be set up to tackle all sources of post-consumer waste before beginning to tackle any single one of them. To us, that seems like a recipe for inaction and failure. Have any states or localities actually implemented or considered it?

Yet we were intrigued by the proposed "Transaction Eco Fee," which is described as "a small flat fee levied on each retail sales transaction that includes products and packaging that contribute to the waste stream and can be recycled" (p. 6, IBWA Material Recovery Plan). Unlike a bottle deposit, this fee or tax provides no incentive to the consumer to redeem the bottle and recycle it. We know that the incentive represented by (say) a 5¢ deposit does alter consumers' behavior to recycle water bottles and other beverage containers. In your May 8 press release, you list as one drawback of bottle deposits that they "place an extra burden on consumers to return the empty containers to a retail store or redemption center." But that's exactly where that small burden belongs, on consumers who should take responsibility for recycling and properly disposing of the water bottle they purchased and consumed. A redeemable bottle deposit encourages them to do so. Do you think it's more appropriate to place the burden on volunteers who, because they hate streams full of litter, pick up, bag, and haul out hundreds of bags holding thousands of water bottles every year?

It appears that the only substantive difference between our proposal for a bottle deposit and your proposed "Eco Fee" is that your fee would not be refundable, while ours would. A non-refundable fee provides no incentive for consumers to change their behavior except by not purchasing the products contained in recyclable packaging. We would like to discuss ways of restructuring your Eco-Fee so that it would provide an incentive to consumers to behave responsibly by recycling and not littering

We'd like to continue our conversation and request that you share this letter with your Board Members.

We'd like to follow up on your outreach to Fairfax County and bring partners to the table to discuss possible next steps with you. Virginia State Delegate Mark Levine has offered to engage in such a conversation, and we would be glad to help facilitate it. We'd be interested to hear the IBWA's response to our requests that (1) your members agree to display a more prominent "Recycle me" on water bottles, and (2) that you join us at the Trash Summit this fall, and (3) that you reconsider and support a redeemable bottle deposit. A small bottle deposit seems to be the simplest, most effective, and least burdensome way to address the bottle litter problem. If you disagree, then we look forward to hearing what your solution is. The status quo of shifting the burden to volunteers and allowing tremendous amounts of water bottle litter to pollute our streams, rivers, and oceans is not acceptable.

Sincerely,

Elizabeth Martin

President, Friends of Little Hunting Creek and member, NOVA Trash Action Work Force

cc:

The Honorable Virginia Senator Scott Surovell

The Honorable Virginia Senator Adam Ebbin

The Honorable Virginia Delegate Paul Krizek

The Honorable Virginia Delegate Mark Levine

Alice Ferguson Foundation

Friends of Accotink Creek

Friends of Dyke Marsh

Friends of Huntley Meadows

Friends of Lake Accotink Park

Friends of Little Hunting Creek,

Arlingtonians for a Clean Environment

Clean Water Action

Sierra Club (Great Falls and Mount Vernon Groups)