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August 7, 2017

Ms. Elizabeth Martin
President - Friends of Little Hunting Creek
Member – NOVA Trash Action Workforce
8707 Stockton Parkway
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betsy@folhc.org

Dear Betsy,

Thank you for your July 17, 2017 letter. (I apologize for the slight delay in replying to your letter but things have been quite busy the past several weeks.) As I've expressed to you previously, both in writing and in person, the International Bottled Water Association (IBWA) applauds your groups' efforts to reduce waste and litter, and we share your concerns. It is clear that we have some common goals, including promoting recycling. In addition, we all want to reduce the number of beverage containers (e.g., bottled water, soft drinks, fruit juices, etc.) and other items that end up in the waste stream. However, it is also clear that we have very different views on the best way to approach this issue. As a result, we will just have to continue to agree to disagree on this matter.

Many of the groups and state legislators that you copied on your recent letter (who are also copied on this reply) may not be familiar with IBWA's position on the issues that you addressed. I will therefore take this opportunity to provide them with our views and respond to the points you made.

The information we have on recycling rates and market shares of drink packaging shows that bottled water containers are a minor contributor to U.S. waste stream. All bottled water containers are 100 percent recyclable, and of all the drink packaging that is not recycled, bottled water containers make up just 3.3 percent. In addition, bottled water drinkers are among the best recyclers, with a 33.4 percent recycling rate, which exceeds the 30.1 percent recycling rate for all PET beverage containers. But we know that there is room for improvement and our members are committed to continuing their recycling efforts.

IBWA is also proud to be a supporter of The Recycling Partnership (formerly Curbside Value Partnership), which has been working diligently across the country to aid in community efforts to increase recycling via curbside collection and new recycling technologies. On a regular basis,

The Recycling Partnership is rolling out new collection programs in cities and towns throughout the U.S. in an effort to increase recycling for all products. IBWA is also a member of three regional recycling groups: the Florida Recycling Partnership, the Michigan Recycling Partnership, and the Northeast Recycling Council.

You mentioned in your letter that you have reservations about IBWA's Material Recovery Program (MRP). However, it is our strong belief that any effort to reduce the amount of packaging waste in the U.S. must include all products and not just target one industry. The intent of the MRP is to encourage a comprehensive approach to effective recycling. It supports the development of new, comprehensive solutions to help manage solid waste in U.S. communities by having all consumer product companies, including bottled water, work together with state and local governments to improve recycling and waste education and collection efforts for all packaged goods.

I would also note that PET plastic bottled water bottles already use less plastic than any other packaged beverage product. According to the Beverage Marketing Corporation (BMC), between 2000 and 2014, the average weight of a 16.9-ounce (half-liter) PET plastic bottled water container declined 51 percent. This resulted in a savings of 6.2 billion pounds of PET resin since 2000. The average weight of a plastic bottled water container is 9.25 grams (although many now weigh as little as 7.5 to 8 grams), while the average weight of a plastic carbonated soft drink bottle is approximately 24 grams. Plastic packaging for carbonated soft drinks has to be much heavier than those used for bottled water products in order to prevent the carbonation from escaping from the container. So, while the number of bottled water containers may be increasing, the total weight of these bottles is far less than other food and beverage packaging that ends up in the waste stream.

Even with continuing growth and increased consumption, bottled water also has the smallest water and energy use footprint of any packaged beverage. The results of a 2014 IBWA benchmarking study show that the amount of water and energy used to produce bottled water products in North America is less than all other types of packaged beverages. On average, only 1.32 liters of water (including the liter of water consumed) and 0.24 mega joules of energy are used to produce one liter of finished bottled water.

You may think that by making the statements in the paragraphs above we are minimizing the amount of bottled water litter. However, that is not the case. We think that these are all important facts and IBWA is very proud of the actions taken by the bottled water industry to reduce its environmental footprint, which is the smallest of any packaged beverage product.

As you noted, IBWA does not support bottle deposit laws. We think that curbside recycling is a more efficient method to recover packaging waste. According to the latest figures from the National Association of PET Container Resources (NAPCOR), bottled water is the number one recycled product, by individual containers, in U.S. curbside recycling programs. In 2016, the curbside recycling rate for bottled water, by container, was 51%. The curbside recycling rate, by container, for soft drinks was 14%.

By the way, I noticed that your letter mentions the possibility of imposing a 5-cent per container deposit fee on all beverage products. However, it is my understanding that your coalition supports a 25-cent per bottle deposit fee. Regardless of the amount, the bottled water industry does not support bottle deposit bills for a number of important reasons, including:

- They would negatively impact consumers--particularly those who could least afford it, such as the elderly and others on fixed incomes--by increasing the cost of a 24-pack case of bottled water or other beverages by \$6.00 with a 25-cent deposit, and \$1.20 per case with a 5-cent deposit. This would make it more difficult for people to drink healthy.
- They would harm existing curbside recycling programs by removing from those programs valuable material that has a high demand in scrap markets, such as aluminum cans and PET and HDPE plastic bottles. This would reduce the overall revenues to cities and towns for their curbside recycling programs, which could lead to the failure of those programs.
- They would lead to fraud and over-redemption, which would further drive up the cost of bottled water and other beverages for manufacturers and consumers.
- They would create a loss of income for businesses due to increased out-of-state cross-border sales, which would impact state estimates on expected revenue gains.
- They would also create potentially unsanitary conditions when used beverage containers are returned en masse to redemption centers that also serve as food retailers.
- They would do nothing to educate consumers about the importance of recycling.

As I mentioned at our meeting on April 5, 2017, because litter is at the core of the problem being addressed by your coalition, we would suggest that you contact Keep America Beautiful (KAB), which is an organization that focuses specifically on litter prevention. KAB has numerous programs and projects aimed at preventing the litter problems being faced by your coalition members. As you know, littering is a human behavior issue, which applies to all food and drink packaging, not just bottled water.

IBWA thinks that is very good news that many consumers are shifting away from less-healthy sugar sweetened beverages by drinking more bottled water. In today's on-the-go society, most of what we drink comes in a package. Encouraging specific, smart, healthy dietary choices – like drinking bottled water instead of sugar-sweetened beverages – can help encourage individuals to lead more active and healthful lives. This is particularly important because of the very high rates of obesity, diabetes, and heart disease in the U.S. Moreover, research shows that if bottled water isn't available, 63% of people will choose soda or another sugar-sweetened beverage– not tap water. So, any efforts to discourage people from drinking bottled water are not in the public interest.

Again, IBWA applauds your groups' efforts and dedication to cleaning up litter. If you have ideas or thoughts on how to achieve our common goals that would fit within the framework of the efforts IBWA supports, please let me know. Otherwise, we will just have to continue to agree to disagree on this matter. I don't think that it would be productive for us to continue to go back and forth about topics on which we have such conflicting views.

Sincerely,



Handwritten signature of Joe Doss in black ink.

Joseph K. Doss
President and CEO
International Bottled Water Association

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 Little Hunting Creek
Arlingtonians for a Clean Environment
Clean Water Action
Sierra Club (Great Falls and Mount Vernon groups)