

Jeff Stier, Director Risk Analysis Division

March 11, 2013

New York City Council 250 Broadway New York, New York 10007

Dear City Council Member:

We are writing to share our concerns about the proposed ban on Styrofoam.

The justifications cited by ban advocates are either the result of an incomplete real-world analysis or are simply based on incorrect information.

Styrofoam might not always be the right choice for all food-service items, but every product carries trade-offs. Just try carrying hot soup in a paper cup. You'll need multiple cups. Those multiple paper cup alternatives, like everything else, come with environmental costs. In fact, Styrofoam is highly energy efficient, and life-cycle studies have shown that it actually requires a whole lot less energy than paper cups. And both products either end up in the landfill or are recycled.

One study finds that replacing one foam cup with three paper cups could require 36 times more water for production, and the dirty paper cups are unlikely to even be recycled. In fact, plastic products cost less because they are very energy efficient, which is one reason businesses use them.

One thing that is frequently recycled is the myth that Styrofoam is not recyclable.

Cities across the country have been doing it, and New York City can learn from their experiences. The product must be cleaned, ground up, heated, and turned into pellets that can be used in a variety of applications.

A related myth is that there is no market for the recycled matter. But there is already demand for the product for construction materials, including "green buildings" and for re-usable packaging of consumer goods.

We recognize that the City is required to meet increasingly ambitious recycling goals, but a ban on recyclable Styrofoam will not contribute towards achieving those goals.

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An outright ban on Styrofoam in food-service settings is an unwise approach. While it won't protect the environment or help the City meet recycling goals, it will unnecessarily increase costs for restaurants, facilities, and consumers. Unfortunately, these costs will be especially burdensome to small businesses, which are important employers in your district, as well as your constituents who are already struggling with the high cost of living in the City. Hardworking, time-pressed New Yorkers rely on the convenience of having a choice of affordable food packaging options.

Inflexible proposals like this one always have unintended consequences that are rarely given due consideration during the policy-making process. In this case, the downsides of a ban include:

- Increased costs to small businesses
- Higher food costs passed along by restaurants
- Increased expenses for social service charities that feed people
- Higher costs to City agencies that serve food
- Environmental costs from alternatives to Styrofoam
- Wasted food

Ultimately, consumers and businesses should be free to decide what type of packing meets their needs.

Sincerely,

Jeff Stier, Senior Fellow, The National Center for Public Policy Research

Julie Gunlock, Director, Women for Food Freedom, Independent Women's Forum

Angela Logomasini, Senior Fellow, Center for Energy and Environment,

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Competitive Enterprise Institute