

From: Howdy Goudey <howdy.goudey@gmail.com>
Sent: Thursday, September 5, 2019 5:20 PM
To: Michele Mancuso <Michele.Mancuso@pw.cccounty.us>; Jody London <Jody.London@dcd.cccounty.us>
Subject: Comments on Polystyrene Ban Ordinance

Dear Contra Costa County Board of Supervisors and Staff,

I welcome the ban of polystyrene foodware in the proposed ordinance. Please consider the following comments regarding this ordinance. I am the chair of the Contra Costa Sustainability Commission, but these are my personal comments on the topic. The Commission submitted separate feedback as part of our August 26th meeting.

The definition of "Environmentally-friendly food service ware" (418-18.002.a.1) only identifies "recyclable" single-use products. The version of the ordinance posted in the Sustainability Commission packet for their Aug. 26th meeting also included "compostable" products, but this reference to compostable products was removed after that draft (this removal was not a recommendation of the Commission).

It is inappropriate to exclude compostable foodware products from the definition of environmentally friendly food service ware. In most cases compostable single-use food ware is superior to recyclable options because the waste food and foodware are processed in the same waste stream and the container does not need to be separated and cleaned of food, as a recyclable container does.

This will be increasingly important as the state mandated compliance with food-waste diversion into (uncontaminated) compost streams is scheduled to increase significantly in coming years. Use of appropriate compostable foodware containers will make this compliance much easier than separating foodwaste and cleaned recyclable containers. Also, renewable plant based single use products (principally paper and wood) are more sustainable and have a lower environmental impact than the supply chain and processing impacts of petroleum based plastics, even when the plastics are recycled. As has been widely recognized, the large fraction of single-use plastics that do not end up being recycled have created serious pollution, on a massive scale, in the oceans and throughout our entire environment.

It is true that there are some materials purported to be compostable (such as flatware made from hard bioplastics) that, in practice, are not suitable for all compost processors, or at least are easily confused with non-compostable items. However, this is not a reason to eliminate superior paper and wood based compostable foodware options from the definition of environmentally friendly food service ware.

By additionally including a definition for compostable products (like 418-18.002.h), that specifies compostable products as items that are accepted by the processors providing service to the unincorporated county, the proper compostable products will be identified as part of the disclosure of acceptable materials by the processors. The acceptable items may change over time with market conditions and processing technology, making the ordinance defined in this manner more adaptable to future changes in the recycling and composting industry.

Both lines 1 and 2 of 418-18.006, Use of polystyrene at County facilities, should be updated to change "may" to "shall." If the county is requiring environmentally-friendly food service ware for all food

vendors, it needs to lead by example and require the same standards at all county facilities, whether it is directly part of a county function, a contractor to the county, or a county facility rental to an outside party.

I further recommend that the re-usable definition of environmentally-friendly food service ware (418-18.002.a.2) be emphasized as the preferred and recommended approach over any single-use product, including a statement that the long term operating costs for the food vendor will often be lower (they will save money) if they utilize re-usable foodware products rather than continuously purchasing single-use disposables.

Thank you for your time and consideration,

Howdy Goudey
635 Elm St.
El Cerrito, CA 94530