

A Letter from 163 Organizations, Companies, Public Officials, and Individuals

April 28, 2020

Mr. Alex M. Azar II
Secretary of the US Department of Health and Human Services
200 Independence Ave., SW
Washington, DC 20201

Re: Plastics Industry Association Request for HHS to Promote Single-Use Plastics

Dear Secretary Azar:

On March 18th, the Plastics Industry Association wrote a letter to you requesting that you “make a public statement on the health and safety benefits seen in single-use plastics,” and to “speak out against bans on these products as a public safety risk... and help stop the rush to ban these products.”

We take seriously the threat of the COVID-19 pandemic and acknowledge the importance of the federal government action to protect public health and address this crisis. However, we are appalled that the plastics industry is fear-mongering in a time of crisis in order to sell more single-use plastic. It is an attempt to further their agenda of stopping bans on high pollution plastic products while demonizing safer, more sustainable alternatives.

Decisions made by your Department should be based on sound science. The plastics industry letter refers to studies showing potential contamination of reusable bags, none demonstrates that reusable bags were a source of transmission of the coronavirus.

The plastics industry letter cites a study funded by the American Chemistry Council (1). The results showed that reusable polypropylene bags can contain bacteria. The study did not demonstrate any health-related threats posed by the levels of bacteria in the reusable bags. The authors suggested that people wash their reusable bags, not replace them with single-use plastic ones. Many foods packaged in plastic contain high levels of bacteria when tested. In response to this study, Consumer Reports’ food safety experts were underwhelmed, stating “A person eating an average bag of salad greens gets more exposure to these bacteria than if they had licked the insides of the dirtiest bag from this study.”(2) The bacteria detected in this study are not at all relevant to coronavirus transmission.

Another study cited the letter cited connects a girls’ soccer team that was sickened by transmission of norovirus to a reusable bag in a hotel room. One sick girl's sneezing and coughing contaminated just about every surface in the room. The researchers did not know if the girls were infected from touching the bag or consuming the food inside the bag but concluded there was a need for disinfecting contaminated surfaces, including the bag.(3) The

norovirus could also have been present on that bag if it were a single-use product. The fact that it was reusable was irrelevant.

Industry claims that single-use plastics are the best material choice for preventing coronavirus transmission are unfounded. Coronavirus can survive on the surfaces of all kinds of materials, regardless of whether the materials are designed for single or repeated use. A study by the U.S. National Institutes of Health found that coronavirus (HCoV-19) remains on plastics and stainless steel for up to three days and on cardboard for up to one day.(4) Another study shows that Sars-CoV-1, a similar strain of coronavirus, can last up to 9 days on plastic.(5) On polystyrene, Sar-CoV-1 can last more than 6 days.(6) None of these studies indicates that reusable plastics are more prone than disposable to harboring the virus.

Sanitizing product surfaces and hand-washing are the best protection, as indicated by FDA's "Best Practices Retail Food Stores, Restaurants, and Food Pick-Up/ Delivery Services during the COVID-19 Pandemic."(7) California's OSHA Guidance for "COVID-19 Infection Prevention in Grocery Stores" also focuses on cleaning and disinfection and adds that people bringing reusable bags can fill them on their own to prevent transmission of coronavirus.(8)

The plastics industry letter also attacks reusable cups and containers. The U.S. Food Code guides all state codes and practices in food service with respect to sanitizing reusable foodware, ensuring that restaurants practice high levels of sanitation for dine-in and take-out of prepared food. The small but growing cadre of companies that provide reusable cups and containers for take-out have to adhere to the same requirements as restaurants, washing and sanitizing reusables at high temperatures. Reusable foodware is therefore sanitary, unless touched by or droplets are transferred by someone carrying a transmissible virus. Again, the appropriate prevention strategy is to keep hands clean, sanitize surfaces, and follow health codes.

Your Department should focus on an entirely different threat from food packaging. According to a recently-released peer-reviewed scientific consensus statement, over 12,000 chemicals are used in food packaging and many of them are hazardous to human health. Many of these are hazardous chemicals that migrate into our food and beverages.(8) We urge your Department to ensure that the FDA do a better job of protecting human health against these threats by eliminating the "Generally Recognized as Safe" loophole and requiring that manufacturers conduct feeding studies for chemicals used in packaging to determine health risks. More stringent evaluation is needed for phthalates, bisphenols, percolate, and poly and fluorinated chemicals, among other chemicals.

The Department of Health and Human Services should not let the plastics industry trade the coronavirus crisis for the climate and plastic pollution crises. Great progress is being made in reducing pollution caused by single-use plastic. In jurisdictions where plastic bags are banned or charges are in effect in the U.S., there has been a significant decrease in plastic bag litter and concomitant increase in reusable bags. Similar progress is starting to be made in switching out single-use plastic and paper food packaging for reusables.

We respectfully request that your Department dismiss the industry request to weigh in and promote single-use plastic as safer than other materials from a health perspective. The science doesn't support this conclusion.

Sincerely,

Non-Profit and Academic Institutions

Miriam Gordon, Policy Director, UPSTREAM
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Clifford Edevbie, CEO, Clean Climate and Environment Campaign Initiative
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Public Officials

Linda S. Birnbaum, Ph.D. (Retired) Former Director, NIEHS/NIH and NTP/DHHS
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Heidi Lovett, member, Montgomery County (MD) Solid Waste Advisory Committee
Rachel White, Environmental Scientist, NJDEP
Kate Harrison, Berkeley City Councilmember
Jesse Arreguin, Mayor, City of Berkeley
Donna Chralowicz, Planner, City of San Diego

Individuals

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Rhyanna Anderson
Devi Ravindraraj
Hannah Gordon
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(1) https://www.researchgate.net/publication/230760262_Assessment_of_the_Potential_for_Cross_Contamination_of_Food_Products_by_Reusable_Shopping_Bags

(2) <https://www.consumerreports.org/cro/news/2010/07/can-reusable-grocery-bags-make-you-sick-or-is-that-just-baloney/index.htm>

(3) <https://www.ncbi.nlm.nih.gov/pubmed/22573873>

(4) <https://www.nejm.org/doi/10.1056/NEJMc2004973>

(5) Chan, K.H., Peiris, J.S., Lam, S.Y., Poon, L.L., Yuen, K.Y., and Seto, W.H. The effects of temperature and relative humidity on the viability of the SARS Coronavirus. *Adv Virol.* 2011; 734690

(6) Rabenau, H.F., Cinatl, J., Morgenstern, B., Bauer, G., Preiser, W., and Doerr, H.W. Stability and inactivation of SARS coronavirus. *Med Microbiol Immunol.* 2005; 194: 1–6-

(7) <https://www.fda.gov/food/food-safety-during-emergencies/best-practices-retail-food-stores-restaurants-and-food-pick-up-delivery-services-during-covid-19>

(8) <https://www.dir.ca.gov/dosh/Coronavirus/COVID-19-Infection-Prevention-in-Grocery-Stores.pdf>

(9) <https://ehjournal.biomedcentral.com/articles/10.1186/s12940-020-0572-5>