International Bottled Water Association

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Mr. Sean O. Burton, President
and Commissioners
Board of Airport Commissioners
Los Angeles World Airports
1 World Way
Los Angeles, CA 90045

RE: Adoption of the Los Angeles World Airports Single-Use Plastic Water Bottle Phase-Out Policy

Los Angeles Board of Airport Commissioners:

Thank you for the opportunity to provide comments regarding the proposed ban on the sale of bottled water in plastic containers at Los Angeles World Airports (LAWA). The International Bottled Water Association (IBWA)[1] is opposed to this proposal because it is not in the public interest.

Bottled water has the smallest environmental footprint and is the healthiest packaged beverage product. The ban on water sold in plastic bottles will lead to water being sold in packaging that is much less environmentally friendly when viewed over the lifespan of the packaging material. In addition, if consumers do not have access bottled water products in their preferred plastic container, they are likely to purchase a less healthy beverage in a much heavier plastic bottle that which will actually increase the amount of waste generated at SFO. Products such as carbonated soft drinks, juices, and other sugary beverages require far more *plastic packaging* and have a *greater environmental impact* than bottled water.

IBWA strongly urges you to reconsider this proposal and not move forward with a ban on the sale of bottled water in plastic packaging because:

- other beverage choices that will still be allowed for sale, including those in plastic, as well as any beverage sold in glass, aluminum, and carton containers are not as environmentally friendly as bottled water.
- prohibiting the sale of bottled water in plastic containers will lead to individuals choosing less healthy beverages.

[1] IBWA is the trade association representing all segments of the bottled water industry, including spring, artesian, mineral, sparkling, well, groundwater and purified bottled waters. IBWA represents bottled water bottlers, distributors and suppliers throughout the United States, including several small, medium and large-size companies. IBWA's stated mission is to serve the members and the public, by championing bottled water as an important choice for healthy hydration and lifestyle, and promoting an environmentally responsible and sustainable industry.

Plastic Containers Are a Better Environmental Solution for Packaging

In electing to eliminate the use of single-serve plastic bottled waters, LAWA is removing the most environmentally friendly packaging option for beverages. A recent report from the American Chemistry Council (ACC), conducted by Franklin Associates, examined the overall impact of plastics on the environment, compared to other materials. The study looked at energy demand, water consumption, solid waste, global warming potential, eutrophication potential, smog formation potential, and ozone depletion potential. The ACC report concluded that, when comparing materials throughout the entire life cycle of a package, plastics leave a much smaller environmental footprint than alternatives, such as glass, aluminum cans, and paperboard cartons.[2] Perhaps the most significant finding from the ACC report is that alternatives to plastic beverage containers would produce about 60 percent more greenhouse gas emissions—a major contributor to climate change.

The ACC study data is supported by the Life Cycle Assessment prepared by Trayak LLC for IBWA. In this assessment, Trayak measures several variables to determine the overall impact of specific packaging types, including PET water bottles, PET soda bottles, glass bottles, canned water, and beverage cartons. The variables measured include fossil fuel use, human impact, water use, mineral resource use, greenhouse gas emissions, and freshwater ecotoxicity and eutrophication. The assessment strongly indicates that PET water bottles show lower environmental impacts than the other containers across each of the considered indicators.[3] Much of this benefit is derived from the low material usage compared to the other container types, with the average PET water bottle considered using less than half of the material weight of the other container types. Lower material usage means less impact from material extraction, manufacturing, and ultimately results in less material entering landfills or needing to be recycled.

Bottled Water Industry as an Environmental Steward

Bottled water has the smallest environmental footprint of all packaged beverages. All bottled water containers are 100 percent recyclable—even the caps, and, as an industry, we support strong community recycling initiatives and recognize that a continued focus on increased recycling is important for everyone. In addition, PET bottled water containers are the most recognized and most recycled containers in curbside programs, making up nearly 55 percent of all PET plastic beverage containers collected.[4]

The industry is always looking for ways to strengthen existing recycling programs and help expand recycling efforts ever further. However, even when they are not properly recycled, individual serving size PET plastic bottled water containers make up only 3.3 percent of all drink packaging in U.S. landfills. Soda PET plastic containers make up 13.3 percent, and aluminum cans make up 7.9 percent.

Bottled water also has the lowest water- and energy-use ratios of all packaged beverages. On average, it takes only 1.39 liters of water to produce 1 liter of finished bottled water (including the 1 liter of water consumed), which is the lowest water-use ratio of any packaged beverage

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[2] Life Cycle Impacts of Plastic Packaging Compared to Substitutes in the United States and Canada. April 2018. Available at: https://plastics.americanchemistry.com/Reports-and-Publications/LCA-of-Plastic-Packaging-Compared-to-Substitutes.pdf

[3] Life Cycle Assessment for the IBWA. 2021. Available at: https://votervoice.s3.amazonaws.com/groups/ibwa/attachments/IBWA%20Trayak%20Report%2032321.pdf

[4] National Association for PET Container Resources' 2018 Postconsumer PET Bottle Bale Composition Analysis.

product. And on average, only 0.21 mega joules of energy are used to produce 1 liter of bottle of water.[5]

While bottled water is just one of thousands of consumer items packaged in plastic, the bottled water industry has also gone to great lengths to reduce the environmental impact of its packaging, including developing new technologies in product packaging such as the use of recycled content, reduction of plastic used in caps and shrink-wrapping, and reduction of paper used in labels and shipping cardboard. IBWA member companies are increasing their use of recycled PET (rPET), and many bottled water companies already use bottles made from 50, 75, and, in some cases, 100 percent rPET. Furthermore, the bottled water industry is continually developing additional ways to reduce its environmental footprint from production to distribution to consumption. Those efforts include development of "green" bottling facilities, as well as utilization of more fuel-efficient means of producing and transporting product to market.

Bottled water companies have also reduced the environmental footprint of their plastic containers by continual light-weighting of PET bottled water plastic packaging, which has resulted in the average weight drop to 8.3 grams per 16.9 oz single-serve container. That is almost one-third less PET than the amount it takes to make soda and other drink containers, which need to be thicker due to carbonation and manufacturing processes and weigh, on average, 22.2 grams.

Bottled Water's Role in Healthy Hydration

For those who want to eliminate or moderate calories, sugar, caffeine, artificial flavors or colors, and other ingredients from their diet, or simply wish to opt for a convenient beverage with refreshing taste, reliable quality, and zero calories, choosing water is the right choice – no matter what the delivery method. Bottled water is a smart decision and a healthy choice when it comes to beverage options.

In fact, since 1998, approximately 73% of the growth in bottled water consumption has come from people switching from carbonated soft drinks, juices, and milk to bottled water. One of the simplest changes a person can make is to switch to drinking water instead of other beverages that are heavy with sugar and calories. According to the Institute of Medicine and the American Journal of Preventative Medicine, two-thirds of American adults are overweight with one-third of those individuals being obese, and over the last 30 years, children's obesity rates have climbed from 5% to 17%. Drinking zero-calorie beverages, such as water, instead of sugary drinks is regularly cited as a key component of a more healthful lifestyle, and promoting greater consumption of water from all sources, including from bottled water, can only benefit those efforts.

Conclusion

IBWA asks that you consider that there are thousands of beverage and food products made with plastic and offered to consumers each day. Banning the sale of bottled water in plastic containers, a very small part of the larger family of products using plastic, is unwarranted due to its position as a leader in environmental stewardship and the fact that this proposal would likely increase the amount of waste generated by LAWA.

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[5] Water and Energy Use Benchmarking Study. Antea Group, prepared for the International Bottled Water Association. November 14, 2018. Available at: https://bottledwater.org/wp-content/uploads/attachments/IBWA_ExecSummary_14Nov2018_0.pdf

Thank you for your consideration of IBWA's concerns regarding the proposed ban on the sale of bottled water in plastic packaging in the Los Angeles World Airports. We encourage you to take these points in to consideration as you move forward with policies to combat climate change and reduce waste. Please do not hesitate to contact IBWA with any concerns or questions.

Sincerely,

James P. Toner, Jr.
Director of Government Relations
International Bottled Water Association