



CONTAINER
RECYCLING
INSTITUTE

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Israel Trejo
City of Fresno
Planning and Development

August 2, 2017

RE: Text Amendment Application No. TA-17-002

Dear Mr. Trejo,

The Container Recycling Institute opposes the proposal to restrict the operation of beverage container redemption centers. The set of proposed restrictions is **so onerous** that we fear it will drive many—if not all—of the redemption centers in the City to close their doors permanently. Such a result will be financially harmful to Fresno residents, will have negative environmental impacts, and will represent new costs for the City:

1. **Financial harm to consumers:** Fresno consumers are the recipients of *almost \$15 million in refunded deposits* per year. This is based on Fresno's population of half a million constituting 1.3% of California's population, and consumer refunds of about \$1.1 billion statewide. If the redemption process is made significantly more difficult—requiring consumers to travel longer distances to redeem beverage containers because their usual centers have closed—they may find that it is *not economically feasible* for them to return their empties. These consumers could collectively be forfeiting as much as \$14.7 million: money that they could otherwise be spending locally on groceries and other items.
2. **Environmental impacts** will result from decreased redemption recycling in the City of Fresno:
 - a. Less recycling means that **more energy and resources** will be consumed in making new beverage containers from 100% virgin resources, contributing to *pollution* and *greenhouse gas emissions*.
 - b. Many littered containers (that indigent people and others now collect and redeem to supplement their income) will remain on the streets, parks, and other public places. More litter will be an *aesthetic nuisance*, and may harm *wildlife, livestock*, and even *people* (broken bottle glass is a common source of cuts and visits to the ER).
3. **New costs for the City:** making deposit redemption more difficult, if not impossible, for Fresno consumers will have at least four adverse impacts on the City budget:
 - a. Curbside: some consumers may put their empties in with other recyclables at curbside—thus *driving up the cost of curbside operation* due to increased volumes.
 - b. Trash collection: if consumers throw empties in the garbage, *waste collection and disposal costs* will rise due to higher trash volumes.
 - c. Litter abatement: increased litter on city streets, in local parks, and in many other public places will require the DPU and other departments to *spend more money on litter cleanup*.
 - d. Decreased state revenue: CalRecycle has stated that with decreased redemption, the City could be *forfeiting \$330,000* that they currently receive from the state each year.

For all these reasons, we oppose the proposal to restrict the operation of redemption centers in Fresno.

Respectfully yours,

Susan Collins
President and Executive Director, Container Recycling Institute

About the Container Recycling Institute (CRI): CRI is a nonprofit organization and a leading authority on the economic and environmental impacts of used beverage containers and other consumer-product packaging. Its mission is to make North America a global model for the collection and quality recycling of packaging materials.