



NORTHERN CALIFORNIA RECYCLING ASSOCIATION

June 10, 2020

Lisa B. Hernandez, MD, MPH
Health Officer
City of Berkeley
Health Housing, and Community Services, Public Health Officer Unit
1947 Center Street, 2nd Floor
Berkeley, CA 94704

Re: Customer-Provided Bags, Mugs, and Other Reusable Items During COVID-19

Dear Dr. Hernandez,

Thank you for all of your efforts to help save lives during the COVID-19 crisis. We would also like to thank you for revising the City of Berkeley's Shelter-In-Place Order to allow customers to bring their own bags, mugs, or other reusable items from home. This practice protects both public health and the environment and is consistent with existing State, County, and local recycling and reuse policies. Thank you for your leadership on this issue.

However, we also request some clarifying language on this matter. The City of Berkeley's current Shelter-In-Place Order (Appendix A, page 7) states, "Customers are permitted to bring their own bags, mugs, or other reusable items from home, but they must not place them on any surfaces." It is unclear how customers are to use their own bags, mugs, or other reusable items without placing them on a surface.

We recommend that you revise the City of Berkeley's Order and use the language below from Mendocino County's Order (Appendix A, page 24, May 28), or similar:

"Not permitting customers to bring their own bags, mugs, or other reusable items from home that must be handled by employees. Customers bringing their own reusable items that do not require handling by employees is permissible."

We believe that this revised language would allow environmentally beneficial practices while still protecting the health of employees and customers. Implementing reuse and recycling policies requires years of public education to change old behaviors and create good habits, all of which could be wasted if interrupted for a substantial period of time.

We recommend that customers be allowed to bring their own reusable shopping bags as long as the customers and the store follow the Cal-OSHA issued [guidelines for the safe use of reusable bags](#):

- If customers bring their own bags, ensure:
 - Bags are not placed on conveyor belts or any other area outside of shopping carts.
 - Bags make no contact with employees.
 - Customers bag their own groceries.
 - Customers do not bag groceries in the checkout area if they cannot maintain physical distancing. Groceries can be placed in a cart and bagged elsewhere by the customer.
 - Increase the frequency of disinfection in bagging areas used by customers.

Carts should be sanitized after each use. Following these guidelines, the reusable bags should pose no more of a health risk to employees or other customers than the purses or handbags that customers bring into the store, or the clothing that they wear. Our recommendation takes into account the recent statement by the CDC that the COVID-19 virus does not spread easily from touching surfaces or objects.

The Northern California Recycling Association ([NCRA](#)) is a non-profit organization founded in 1978, primarily to promote environmentally sound discards management practices, including waste reduction, reuse, recycling, and composting. Our 350 members include recycling businesses, employees, entrepreneurs, and individuals supportive of various Bay Area and State Zero Waste initiatives.

Thank you for your consideration of our recommendation. If you need further information on this topic, please contact the undersigned.

Sincerely,

K. D. Brooms

K. Douglas Brooms
ZWAC Co-Chair

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