June 30, 2020

Karen Relucio, MD, Napa County Health Officer
Health & Human Services Agency Public Health Division
2751 Napa Valley Corporate Drive, Bldg. B Napa, CA 94558

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

Dear Dr. Relucio,

Thank you for all of your efforts to help save lives during the COVID-19 crisis. As you continue to adopt and implement science-based orders and policies to navigate this difficult public health and economic crisis, we ask that you consider allowing customers to bring their own bags, mugs, and other reusable items to stores and restaurants. This can be implemented in a way that protects both public health and the environment. The State and Napa County each have long-standing policies favoring reuse and recycling. This proposal falls squarely within the letter and intent of these existing policies. 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. Please follow the lead of Alameda County, Contra Costa County, and Mendocino County in allowing the use of reusable items.

Napa County’s current County Shelter In Place Order contains this language regarding reusable items in Appendix A:

"Not permitting customers to bring their own bags, mugs, or other reusable items from home."

We recommend that you revise your County’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 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:
  o Bags are not placed on conveyor belts or any other area outside of shopping carts.
  o Bags make no contact with employees.
  o Customers bag their own groceries.
  o 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.
  o 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  John Moore  David Krueger
K. Douglas Brooms  John Moore  David Krueger
ZWAC Co-Chair  ZWAC Co-Chair  President

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