



Sensible Safeguards: The Gift That Keeps on Giving

COALITION FOR
SENSIBLE
SAFEGUARDS



Auto Safety and the Holidays

The Thanksgiving, Christmas and New Year's holidays are the busiest travel times of the year in the United States. Shopping for gifts and festive meals and visiting friends and relatives significantly boosts the number of motor vehicles on the nation's roads. According to the U.S. Department of Transportation, long-distance trips (of 50 miles or more) increase by 54 percent (20.65 million trips)¹ during the six-day Thanksgiving travel time and by 23 percent (16.5 million trips)² between Christmas and the New Year compared to the rest of the year.³

The Priceless Gift of Auto Safety

Every holiday season, one of the most valuable gifts all Americans receive is increased safety on the roads. Every day, thousands of lives are saved and injuries prevented as a result of the U.S. auto and vehicle safety laws of the past four decades. From the first regulations for seatbelts and padded dashboards, to more recent mandates for front and side air bags, electronic stability control and improved side impact protection, these lifesaving standards have prevented hundreds of thousands of deaths and injuries and saved taxpayers billions of dollars.

"Auto accidents are particularly tragic during the winter holidays, a time of year when one looks forward to celebrating with friends and families rather than experiencing the pain and suffering associated with a car crash. Throughout the year, highway deaths and injuries are a major public health epidemic with enormous economic and emotional costs to families. Government regulations requiring safety technologies as standard equipment on motor vehicles like seat belts, air bags, electronic stability control and others have saved lives and money. By any measure government action in motor vehicle safety is a significant success story."

**-Jackie Gillan, president,
Advocates for Highway and Auto Safety**

About Highway and Auto Safeguards

The [National Traffic and Motor Vehicle Safety Act and the Highway Safety Act](#), enacted by President Lyndon Johnson on September 9, 1966, pioneered the standards and safeguards of modern-day motor vehicle design. They were passed in response to growing concerns about the skyrocketing death rates and injuries from traffic accidents. [Ralph Nader's *Unsafe at Any Speed*](#), published in 1965, also helped focus public attention on the auto industry's neglect of safety in favor of "power and styling." Congressional hearings affirmed Nader's assertions by revealing "disturbing evidence of the automobile industry's chronic subordination of safe design to promotional styling, and of an overriding stress on power, acceleration, speed and 'ride' to the relative neglect of safe performance or collision protection."

The Benefits of Highway and Auto Safety

Before the passage of the National Traffic and Motor Vehicle Safety and the Highway Safety Acts, no federal safeguards existed to protect Americans from death and injury on the nation's roads. In 1966, when both acts were passed, nearly 51,000 people were killed in crashes. If the 1966 fatality rate of 5.50 deaths per 100 million vehicle miles traveled had continued, some 163,000 people would have been killed in traffic crashes in 2010. Instead, the death rate was 1.11 and fewer than 33,800 were killed.

In addition, tens of thousands of lives have been saved by seat belts, child restraints, air bags, helmets and 21-year-old minimum drinking age laws, as illustrated in the following [table](#):

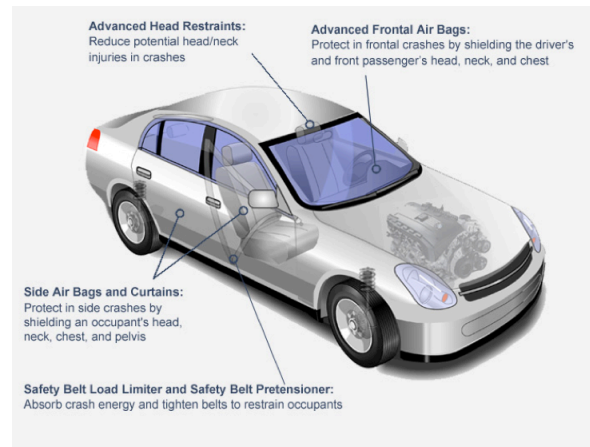


Table 1: Lives Saved by Restraint Use and 21-Year-Old-Minimum-Drinking-Age Laws, and Additional Lives That Would Have Been Saved at 100-Percent Seat Belt and Motorcycle Helmet Use, 2006 - 2010

Year	Lives Saved, Age 4 & Younger	Lives Saved, Age 5 & Older	Lives Saved, Age 13 & Older	Lives Saved, All Ages	Lives Saved	Additional Lives That Would Have Been Saved at 100 Percent Use	
	Child Restraints	Seat Belts	Frontal Air Bags	Motorcycle Helmets	Minimum Drinking Age Law	Seat Belts	Motorcycle Helmets
2006	427	15,458	2,824	1,667	888	5,468	756
2007	388	15,223	2,800	1,788	831	5,048	805
2008	286	13,312	2,557	1,836	716	4,171	827
2009	307	12,763	2,387	1,486	626	3,700	733
2010	303	12,546	2,306	1,550	550	3,341	706

Source: 2006-2009 FARS Final Files and FARS 2010 Annual Report File

Looking to the Future of Auto and Highway Safety

Vehicle safety standards are lifesaving, cost-effective and strongly supported by the general public. Despite the historical progress made in saving lives and preventing injuries in motor vehicle crashes, there is still an urgent need for government action on several key standards affecting vehicle safety as well as overdue improvements in truck and bus safety.

The safety community will continue to push for stronger standards and lifesaving technologies such as better performing seat belts, lane-departure warning systems, improved rollover protection and collision-imminent braking, all of which have the potential to reduce the severity of crashes and save lives.

For more information about the benefits of highway and auto safety standards, please contact [Advocates for Highway and Auto Safety](#) at (202) 408-1711. Also see:

- [Why We Had To Regulate The Auto Industry](#) by Jake Blumgart
- [The Case for Regulation](#), excerpt on the politics of auto safety regulation, *Washington Monthly*, March 1995
- [The Center for Auto Safety](#), founded by Ralph Nader in 1970, advocates for auto safety and consumer rights
- [The Cry Wolf Project](#)

New Credit Card Rules Protect Holiday Shoppers

This year's holiday shopping season has started with a bang with 247 million shoppers (an all-time high and up from 226 million last year) spending an average of \$423 each at local or online stores during the Thanksgiving Black Friday weekend.⁴ According to the National Retail Federation, retail sales during November and December this year are expected to total \$586 billion,⁵ and 28 percent of shoppers will use credit cards as their primary means of payment when purchasing gifts.⁶

Exchanging gifts, visiting with friends and relatives, and organizing festive meals are what make the season special. Unfortunately, the holiday spirit can be marred for shoppers by abusive or misleading practices by credit card companies.

While many Americans use credit cards to pay for holiday-related expenses at the end of the year, 40 percent of low- and middle-income households use credit cards to pay for critical needs such as medical expenses, mortgage payments and utilities.⁷ While Americans' average credit card debt has decreased since the Great Recession, increased joblessness combined with three decades of slow income growth continues to take a toll. The U.S. Census Bureau estimates Americans will carry a total of \$870 billion in credit card debt this year.⁸ Credit card company fees and lack of transparency add pressure to already-strapped family finances, especially during the holidays.

New Credit Card Rules Are Making Consumers Happier

Millions of credit card holders have benefited from the Credit Card Accountability, Responsibility, and Disclosure Act of 2009 (CARD Act) combined with the regulatory and enforcement power of the Consumer Financial Protection Bureau (CFPB), which administers the law. According to a recent J.D. Power and Associates survey, consumers are happier with their credit cards as a result of the CARD Act's provisions⁹ that rein in unfair late fees and interest rate hikes. The CARD Act also protects college students and teens from unfair credit card practices and sets new standards for safeguarding the value of gift cards.

The CFPB has a variety of tools for protecting credit card holders, including rulemaking, enforcement powers and consumer complaint collection. Also, it often works jointly with other government regulators and in recent months, the CFPB has brought enforcement actions against

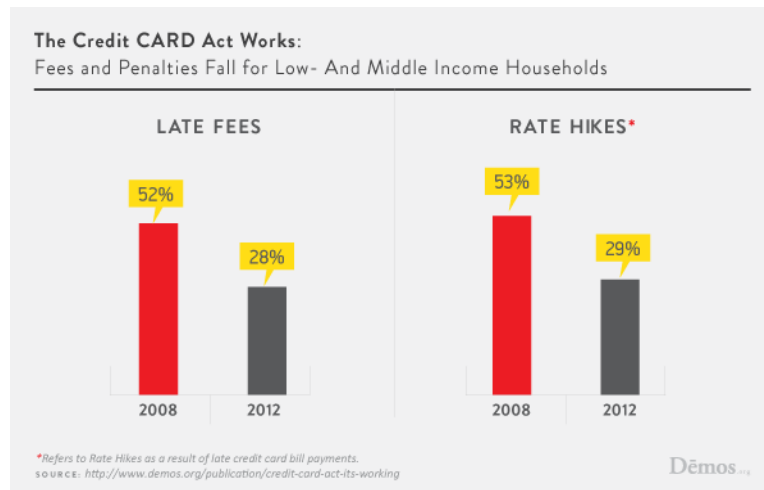
"The evidence is clear: Credit cards are a better, fairer financial product for American consumers as a result of the CARD Act. With improved disclosures and restrictions on the most abusive credit card practices, the law is working as intended to save households money this holiday season and year round."

-Amy Traub, senior policy analyst, Demos

major credit card companies for a range of abusive practices. The result: \$425 million in refunds to 5 million Americans.

Since July 2011, the CFPB has collected some 23,400 complaints against credit card companies, and the J.D. Power survey suggests the complaint database is prompting companies to handle complaints more quickly and more often to customers' satisfaction. CFPB Director Richard Cordray recently told Congress that the bureau found "fewer credit card complaints" than it had expected due to the success of rules implemented after enactment of the Credit CARD Act of 2009.¹⁰

The Credit CARD Act Is Safeguarding American Consumers



Among low- and middle-income families with credit card debt:

- One-third said they are paying down balances faster in response to new requirements for clarity and disclosure on monthly billing statements.
- Between 2008 (before the CARD Act went into effect) and 2012 (when the law was in full swing), the number of households paying late fees dropped by half to 28 percent, and 24 percent fewer households reported interest rates increasing as a result of a late payment.
- New rules requiring companies to have a customer's authorization to go over the limit on his or her credit cards mean 22 percent fewer households have been charged over-limit fees. The benefits have been most dramatic for African-American (32 percent fewer) and Latino (36 percent fewer) households.¹¹

Among all Americans:

- The percentage of credit card accounts experiencing rate hikes over a one-year period has fallen from 15 to two percent since the passage of the CARD Act.
- From January to November 2010, total late fee payments fell from \$901 million to \$427 million.
- Consumers paying over-the-limit fees fell from 12 percent to less than one percent.
- 80 percent of consumers noticed that payments are now due on the same day each month; 77 percent have read the new warning about late fees; and 70 percent have seen the new warning about the dangers of making only minimum payments.¹²

- Across the industry, the gap between stated interest rates and actual rates paid has narrowed considerably, meaning that \$12.1 billion in yearly charges are now more transparent to consumers.¹³

Next Steps for Credit Card Regulation

While the Credit CARD Act and CFPB have benefited millions of American families, additional protections from unjust credit card company actions are needed. The CFPB has proposed a rule to allow creditworthy, stay-at-home spouses to apply for credit and start building credit histories. Additionally, the CFPB is working on a study of mandatory arbitration clauses that prevent consumers from suing credit card companies and ban class-action suits. The study is expected to result in the regulation or prohibition of such clauses. The CFPB's proposed rulemaking on reloadable prepaid debit cards, which are often marketed to vulnerable groups who may not qualify for credit cards, needs to address problems like deceptively high usage fees (for reloading funds or using ATMs, for example), overdraft fees and loan-like functions.

For more information about the regulation of credit cards, contact:

Amy Traub, senior policy analyst, Demos, (212) 633-1405, www.demos.org

Ed Mierzwinski, consumer program director, U.S. PIRG, (202) 546-9707, www.pirg.org

Pamela Banks, senior policy counsel, Consumers Union, (202) 462-6262, www.consumersunion.org



Food Safety and the Holidays

Food is the focal point of many gatherings of friends and family during the holidays. It is a tradition because food brings people together. A dark cloud, however, hangs over America's food safety system that threatens the health of too many people during the holidays and throughout the year. Annually, one in six Americans (48 million people) contracts a foodborne illness. Of those who get sick, 128,000 require hospitalization and 3,000 die. While foodborne illnesses caused by bacteria such as *Salmonella* and *E. coli* can impact anyone, those most vulnerable to infection are young children, the elderly and individuals with compromised immune systems.

During the winter holidays, outbreaks of certain foodborne illnesses become more prevalent. For example, the Center for Science in the Public Interest (CSPI) estimates that 53 percent of the annual outbreaks of foodborne illnesses linked to turkey occur during the months of November and December.

About Food Safety Rules

Although there have been numerous headlines about contaminated food products during 2012, Americans are considerably safer eating their holiday meals today than they were before the U.S. government created a food safety system. Historically, efforts to establish government oversight of food production arose in the wake of Upton Sinclair's seminal work, [*The Jungle*](#), which exposed the horrendous conditions of meat packing plants at the turn of the last century. In response to public outrage, the [Federal Meat Inspection Act](#) and the [Pure Food and Drug Act](#) were both passed in 1906 establishing the framework for America's modern-day food safety system. They called for the continuous inspection of meat slaughter plants and led to the development of the Food and Drug Administration (FDA).

Today, the FDA and the U.S. Department of Agriculture's (USDA) Food Safety and Inspection Service (FSIS) share responsibility for ensuring food safety in the U.S. FSIS oversees the safety of meat, poultry and egg products, while the FDA has jurisdiction over all other food products, including produce, seafood and processed food items.

In an effort to strengthen the nation's food safety system, President Barack Obama

"Food brings people together. It is a staple not just of holiday festivities, but of all celebrations. We've come a long way since Upton Sinclair's famous exposé, *The Jungle*, brought public attention to the need for strong food safety standards; today most people don't question the safety of the turkey on their holiday plate."

**-Sally Greenberg,
executive director,
National Consumers League**

signed the Food Safety Modernization Act (FSMA) into law on January 4, 2011. The law grants the FDA new authority to intervene before foodborne illness outbreaks occur and requires the establishment of prevention-based systems to assure food safety.

Food Safety Regulations – Safeguarding Public Health

Implementation of legislation like the FSMA should continue to improve the standards and safeguards for food production to better protect the health and safety of all Americans. New rules to establish standards for produce safety will improve the safety of fresh fruits and vegetables. FSMA also requires new safety standards for imported food. The law gives the FDA authority to suspend the production of food from companies where problems are identified, thus empowering the agency to more rapidly respond to problems as they occur. The FDA used this authority for the first time earlier this year to halt production at a peanut processing plant where *Salmonella* contamination was identified.

Recently, the USDA has taken steps to declare several strains of *E. coli* (a pathogen commonly found in beef) as “adulterants.” This means that the presence of the bacteria in beef is not permitted and meat contaminated with *E. coli* cannot be sold in supermarkets and butcher shops.

Looking Ahead to 2013

Although the FSMA was signed into law in January 2011, it has not been fully implemented by the FDA. Unfortunately, budget cuts to federal agencies including the USDA, FDA and the Centers for Disease Control and Prevention (CDC) seriously threaten the integrity of our national food safety system. Without adequate funds, federal agencies will be unable to maintain current levels of protection, let alone carry out their increased responsibilities. Adequate resources are essential to support the basic governmental function of assuring the safety of our food supply.



The benefits of food safety regulation are clear: Strong enforcement of standards and the implementation of preventive measures can help reduce outbreaks of foodborne illnesses. During the holidays, that means fewer incidents of food-related sickness, pain and suffering. Also, it means lower medical costs to society from foodborne illnesses, estimated to total between \$2.9 billion and \$6.7 billion annually. Continuing to strengthen standards and maintain budgets for federal inspectors will better safeguard Americans from foodborne illnesses.

For more information about food safety, contact:

Teresa Green, Linda Golodner Food Safety & Nutrition Fellow, National Consumers League, (202) 207-2828, <http://www.nclnet.org>.



Toy and Product Safety During the Holidays

It's the holiday season, and for many families, that means children will soon be unwrapping presents and playing with new toys. Parents also will be receiving a variety of children's products such as cribs, child seats and much more. Before the passage of the Consumer Product Safety Improvement Act (CPSIA) in 2008, the safety of these gifts was much more uncertain than it is today.

In 2007, 46 million toys and 15 million other children's products were recalled because they were found to pose serious health and safety hazards. In some cases, toys were coated with lead paint, children's jewelry contained toxic metals and cribs were unsafe. To make matters worse, the federal agency charged with protecting American consumers did not have the authority or the resources to fulfill its mission. The CPSIA changed all that, and today, it helps to ensure that the holiday season is a time of excitement and joy for American families, undisturbed by dangerous—in some cases even life-threatening—products.

**American children
are safer because
of the Consumer
Product Safety
Improvement Act.**



About Toy and Product Safety

The implementation of the CPSIA and all U.S. toy and product safety is the responsibility of the Consumer Product Safety Commission (CPSC). The CPSIA empowers the CPSC to respond swiftly to emerging toy and product hazards, implement strong safety standards for these products, and immediately inform the American public through an online product database about safety hazards.

The Consumer Product Safety Improvement Act of 2008

In just four years, the CPSIA and the increased oversight authority it provides to the CPSC have prevented numerous potential injuries and deaths from unsafe products nationwide. Especially important are the mandatory standards the CPSIA requires. For example:

- Lead has been significantly reduced in toys, children's jewelry and other products, protecting millions of kids from ingesting this potentially lethal heavy metal.
- A category of toxic chemicals known as phthalates has been banned from children's products.

- Toys must now be tested for safety before they go on the market.
- U.S. crib safety standards now are the strongest in the world.
- Today, the CPSC is more proactive about inspecting the safety of foreign-made toys and other products when they arrive at U.S. ports. This year alone, CPSC inspectors have prevented more than 2 million dangerous toys from reaching store shelves.
- American consumers have access to more and better information about potential toy and other product hazards through the new CPSC database, SaferProducts.gov. Since its launch in 2011, more than 10,000 hazard reports have been posted. The database also has helped to speed the CPSC's identification of dangerous products and their removal from the marketplace.

"The holidays should be a time of celebration and giving. Thanks to commonsense safety standards, the gifts we exchange with the children in our lives are safer than they were just a few years ago, making for a healthier and happier holiday season for everyone."

**- Rachel Weintraub,
legislative director and senior
counsel, Consumer Federation of
America**

The Future of Toy and Product Safety

While the CPSC has been successful in implementing the Consumer Product Safety Improvement Act, its work is not yet complete. Specifically, the CPSC will be developing mandatory safety standards for infant and toddler products, similar to mandatory safety standards already on the books for cribs, infant walkers and toddler beds.

But anti-regulatory legislation would hamper the CPSC's ability to ensure the safety of the gifts we give and receive at the holidays. This is especially true of bills that specifically target independent federal agencies like the CPSC with redundant review and analysis requirements. These bills were all too common in the 112th Congress, especially in the U.S. House of Representatives, and they will likely come up again when Congress returns to work in January 2013.

For more information about the safety of toys and children's products, contact:

Consumer Federation of America – www.consumerfed.org

Holidays and Recycling

Beautifully wrapped gift boxes, lights, holiday greens, Christmas trees and a wide variety of decorations make the winter holiday season an appealing spectacle. Between Thanksgiving and the New Year—as the mailboxes containing gifts arrive at our doors, presents are wrapped and unwrapped, decorations and trees are put up and taken down—Americans throw away about 25 percent more trash than they do the rest of the year.¹⁴

Annually, the U.S. generates 250 million tons of solid waste, according to the U.S. Environmental Protection Agency (EPA).¹⁵ That breaks down to 685,000 tons each day and 4.4 pounds per person.¹⁶ Given this overflow of garbage, solid waste recycling regulations enacted by local and state governments during the past three decades have produced immense benefits. Much of the solid waste that is not recycled ends up in landfills, where hazardous emissions may threaten human health and the environment. As organic matter decays, landfills release toxic gases such as methane—a more potent greenhouse gas than carbon dioxide. Groundwater pollution from liquids that drain out of landfills into fresh waterways is another common problem.



Recycling – An Environmental and Health Safeguard

Generally, recycling is legislated by city and state governments. At the national level, the EPA sets recycling goals and regulates hazardous wastes and landfills. State recycling rules fall into two major categories: landfill bans and recycling goals. Landfill bans make it illegal to dispose of enumerated items in a landfill. Most often these items include yard waste, oil and recyclables easily collected in curbside recycling programs. States with landfill bans of recyclables include Wisconsin, Minnesota, Michigan and North Carolina. Other states, such as California and Illinois, focus on recycling goals.

Today, recycling and composting diverts a third, or some 83 million tons, of America's waste away from landfills annually. Even as Americans have generated increasing amounts of trash, our recycling rates also have grown—from less than 10 percent in 1980 to 34 percent by 2010.¹⁷

According to the EPA, disposal of waste to a landfill also has decreased from 89 percent of the amount generated in 1980 to about 54 percent in 2010.¹⁸

The benefits of recycling include more jobs, economic development and tax revenue:¹⁹

- Recycling creates new businesses that haul, process and broker recovered materials, as well as companies that manufacture and distribute products made with these recycled materials.
- The recycling and reuse industry consists of approximately 56,000 establishments that employ 1.1 million people, generate an annual payroll of nearly \$37 billion, and gross more than \$236 billion in annual revenues.
- Unlike the waste management industry, recycling adds value to materials, contributing to a growing labor force including materials sorters, dispatchers, truck drivers, brokers, sales representatives, process engineers and chemists. These jobs also generally pay above the average national wage, and many are in inner-city urban areas where job creation is vital.
- The recycling and reuse industry generates billions in federal, state and local tax revenues (estimated at \$12.9 billion in 2001).

“Unemployment is hard on individuals and families at any time of the year and even more so during the holidays when travel, special meals and the exchange of gifts are central activities. Today, when our country needs strategies to create good jobs, recycling represents an opportunity to put people to work building a stronger, more efficient economy and a cleaner, healthier environment.”

-Lee Anderson, senior policy analyst, BlueGreen Alliance

Other benefits from recycling include:²⁰

- Fewer landfills necessary for the disposal of solid waste.
- Reduced state and local government costs for handling solid waste. Landfill space is expensive and does not offer any monetary return on the investment. Recycling, on the other hand, produces income that not only offsets the cost of establishing recycling facilities but also generates significant income through tax revenues for local, state and federal governments. The EPA reports that recycling enterprises produce an estimated \$236 billion in annual revenues. Increased water conservation by reducing the use of massive amounts of water necessary to mine, refine and manufacture products (e.g. recycling one ton of paper saves 7,000 gallons of water).
- Natural resource conservation by reducing the amounts of virgin natural resources for producing paper, glass containers and aluminum cans (e.g. making an aluminum can from recycled materials requires just five percent of the energy required to make an aluminum can from virgin materials).

Looking to the Future of Recycling

At the state and local levels, public support for recycling programs has led to their continued growth nationwide. Looking to the future at the federal level, there is growing support for the Responsible Electronics Recycling Act ([H.R. 2284](#)), proposed by U.S. Rep. Raymond Green (D-Texas), which would stop sham U.S. “recyclers” from dumping electronic waste on developing countries and promote recycling jobs at home. The bill addresses the toxic exposures caused by e-waste dumping and primitive recycling operations in countries like China, India, Nigeria and Ghana. H.R. 2284 is

endorsed by many environmental groups and the manufacturers and retailers of electronic devices including Dell, HP, Samsung, Apple and Best Buy.

For more information about the regulation of recycling, please contact: Lee Anderson, Senior Policy Analyst, BlueGreen Alliance, leea@bluegreenalliance.org, (202) 706-6913.

¹ http://www.bts.gov/publications/america_on_the_go/us_holiday_travel/html/figure_01_04_table.html

² http://www.bts.gov/press_releases/2003/bts028_03.html

³ http://www.bts.gov/publications/america_on_the_go/us_holiday_travel/html/entire.html

⁴ http://www.nrf.com/modules.php?name=News&op=viewlive&sp_id=1462

⁵ http://www.nrf.com/modules.php?name=News&op=viewlive&sp_id=1433

⁶ http://www.nrf.com/modules.php?name=News&op=viewlive&sp_id=1448

⁷ Amy Traub and Catherine Ruetschlin, "The Plastic Safety Net: Findings from the 2012 National Survey on Credit Card Debt of Low- And Middle-Income Households," Demos.org, May 22, 2012.

<http://www.demos.org/publication/plastic-safety-net>

⁸ US Census, Table 1188, Credit Cards – Holders, Number, Spending, and Debt, 2000 and 2009, and Projections, 2012. <http://www.census.gov/compendia/statab/2012/tables/12s1188.pdf>

⁹ Martha C. White, "The Real Reason We're Suddenly Happier With Our Credit Cards," Time Magazine, August 31, 2012, available at <http://business.time.com/2012/08/31/the-real-reason-were-suddenly-happier-with-our-credit-cards/#ixzz2E0CKDAaw>

¹⁰ Carter Dougherty, "Cordray Says Credit Cards Yield Fewer Complaints Than Expected," Bloomberg Business Week, September 13, 2012, available at <http://www.businessweek.com/news/2012-09-13/cordray-says-credit-cards-yield-fewer-complaints-than-expected>

¹¹ "The Credit CARD Act: It's Working," Demos.org, May 22, 2012. <http://www.demos.org/publication/credit-card-act-its-working>

¹² <http://www.consumerfinance.gov/credit-cards/credit-card-act/feb2011-factsheet/>

¹³ <http://www.responsiblelending.org/credit-cards/research-analysis/FinalCRL-CARD-Report-exec2-16-11.pdf>

¹⁴ <http://www.epa.state.oh.us/pic/facts/holiday.aspx>

¹⁵ <http://www.epa.gov/epawaste/nonhaz/municipal/index.htm>

¹⁶ <http://www.epa.gov/epawaste/nonhaz/municipal/index.htm>

¹⁷ *Municipal Solid Waste Generation, Recycling, and Disposal in the United States: Facts and Figures for 2010*, U.S. Environmental Protection Agency,

http://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=2&cad=rja&ved=0CDsQFjAB&url=http%3A%2F%2Fwww.epa.gov%2Fwastes%2Fnonhaz%2Fmunicipal%2Fpubs%2Fmsw_2010_rev_factsheet.pdf&ei=jG2-UiICILHQAApNgNgE&usg=AFQjCNG6Ane7s-NE9MfDfxCGInIbIjkeaA&sig2=flQKsDDOg_S2B2Yxkgny7g

¹⁸ *Municipal Solid Waste Generation, Recycling, and Disposal in the United States: Facts and Figures for 2010*, U.S. Environmental Protection Agency,

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¹⁹ <http://www.epa.gov/osw/conserve/tools/localgov/benefits/>

²⁰ <http://www.epa.gov/osw/conserve/tools/localgov/benefits/>