



**Statement of Nestlé Waters North America**

**TO:** Senate Natural Resources Committee  
**RE:** S. 227  
**Date:** March 11, 2020

Nestlé Waters North America (NWNA) submits this statement with respect to S. 227. NWNA provides this statement as the Committee explores public policy approaches related to mandatory recycled content standards and the state’s bottle deposit program.

ARROWHEAD

DEER PARK

ICE MOUNTAIN

Ozarka

Poland Spring

Zephyrhills

NWNA produces and distributes a variety of bottled water brands in the U.S., including Poland Spring®, which has been sustainably sourced in Maine since 1875.

NWNA is committed to keeping plastic out of landfills and the environment—a responsibility shared by everyone who makes or drinks packaged beverages. Like other beverage manufacturers, we have made commitments to increase our use of recycled content throughout our portfolio. This includes a goal of achieving 25% recycled plastic across our U.S. domestic portfolio by 2021 and 50% by 2025. We have a further ambitious goal of converting our Poland Spring PET containers to 100% recycled content by 2022.



To achieve these goals, there needs to be a robust and stable regional supply of food-grade recycled content. We are encouraged by the announcements of recent infrastructure investments in the Northeast region to increase supply, but more investment in collection and processing is needed.



Historically, beverage manufacturers have purchased food-grade recycled content through short-term supply contracts or on the spot market. Price volatility between virgin content and recycled content has made long-term supply contracting difficult. Without long-term supply contracts, recycled content suppliers are often unable to make the necessary investments in machinery, equipment, and collection to increase supply.<sup>1</sup>



In addition, too many recovered beverage containers are being down-cycled and used in non-food contact applications versus being made back into beverage containers. While giving a plastic beverage container another life in products such as carpets and textiles ensures one more use, it does not represent the highest and best use of food-grade recycled material.



We believe if constructed thoughtfully, recycled content standards will solidify demand thereby stimulating the necessary further collection and investments to increase regional supply. This is a similar dynamic that existed when the region first considered establishing renewable portfolio standards. Establishing a recycled content standard will

<sup>1</sup> [http://www.closedlooppartners.com/wp-content/uploads/2017/11/CLP-RPET-Report\\_Public-FINAL2.pdf](http://www.closedlooppartners.com/wp-content/uploads/2017/11/CLP-RPET-Report_Public-FINAL2.pdf)

also re-align end market use so that more food-grade recycled content is recycled back into food-grade applications.

Recycling policies in New England are, unfortunately, fragmented. Since products move in interstate commerce and issues related to resource recovery cross state lines, we strongly support regional coordination and alignment on public policy solutions—similar to the regional efforts that were involved to establish the Regional Greenhouse Gas Initiative (RGGI). We have, therefore, supported regional uniformity efforts on policies related to New England’s existing bottle deposit systems and recycled content standards.<sup>2,3</sup> As the Committee explores potential policy changes, we encourage the Committee to explore policy approaches that explicitly encourage regional coordination.

Thank you for the opportunity to share our views on this important topic.

Sincerely,

Peter DePasquale  
Vice President, Government & Regulatory Affairs  
Nestlé Waters North America

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<sup>2</sup> Op Ed, [It’s Time to Modernize and Bring Regional Uniformity to New England’s Bottle Bills](http://www.courant.com/opinion/op-ed/hc-op-broll-recycling-bottle-bill-0721-20190721-fywpk73rmjfd3pb2ya6qalwtpe-story.html), Charles Broll, Hartford Courant, July 21, 2019, available at: <http://www.courant.com/opinion/op-ed/hc-op-broll-recycling-bottle-bill-0721-20190721-fywpk73rmjfd3pb2ya6qalwtpe-story.html>

<sup>3</sup> [Nestlé Backs Amendment to Bill Mandating PCR for Plastic Bottles in Maine](https://www.wastedive.com/news/nestle-waters-maine-plastics-bottle-recycled-content/570994/), Waste Dive, January 27, 2020, available at: <https://www.wastedive.com/news/nestle-waters-maine-plastics-bottle-recycled-content/570994/>