

# Vermont Single Use Products Working Group

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# WHAT I WILL COVER

- EPR goals
- EPR myths
- Design for the environment or design for recycling?

# EPR Goals

- Provide **incentives to manufacturers** to make changes that can result in less toxic, easier to recycle products/packaging
- Provide for **convenient collection opportunities** for used products/packaging, that can result in increased recycling rates
- Provide **financial relief to municipalities and taxpayers** for the costs of managing used products/packaging (the costs can be embedded)

# LESS TOXIC?

- Toxics in Packaging Reduction Act
- Vermont one of 19 states to enact
- De facto national law

# PRODUCT REDESIGN?

- OECD: **no** product redesign
- Disruptor fees date back to 2011
- Eco-modulation fees new attempt to overcome the failure of disruptor fees
- Reality is that these fees are greatly outweighed by economic and environmental benefits of some “nonrecyclable” packages

# CONVENIENT COLLECTION OPPORTUNITIES?

- How to protect small hauler/recyclers?
- How to ensure two existing MRFs get payments that cover their actual costs?
- How to guarantee recyclables will continue to be processed in Vermont if more New England states/New York adopt EPR for packaging & paper?

# FINANCIAL RELIEF TO MUNICIPALITIES & TAXPAYERS?

- Will taxes be lowered?
- Regressive tax with biggest impact on lower income Vermonters

# MYTH: “PRODUCER” GROUPS

- Industry working together



# MYTH VERSUS REALITY: “PRODUCER” GROUPS

- Industry working together

OR

- Companies writing a check which is simply the cost of doing business
- Compliance costs

# MYTH: ECONOMIES OF SCALE

- Economies of scale rationalize the recycling system with lower costs

# MYTH VERSUS REALITY: ECONOMIES OF SCALE

- Economies of scale rationalize the recycling system and lower costs

BUT

- If economies of scale are good, why not one grocery chain or gasoline company for all of Vermont?

# MYTH: PRODUCERS PAY FOR RECYCLING

- Producers pay the full cost of recycling

# MYTH VERSUS REALITY: PRODUCERS PAY FOR RECYCLING

- Producers pay the full cost of recycling

OR

- They pay what the “producer” organization believes to be reasonable costs for both collection & processing, not necessarily the real costs

# MYTH: PRODUCERS INTERNALIZE COSTS

- Producer cost internalization sends a price signal to consumers

# MYTH VERSUS REALITY: PRODUCERS INTERNALIZE COSTS

- Producer cost internalization sends a price signal to consumers
- OR
- Just a pass through cost the consumer doesn't know about

# IS EPR GOOD FOR THE ENVIRONMENT?

- Design for recycling or
- Design for the environment?
- Sustainable Materials Management



# ENVIRONMENTAL IMPACTS OF COFFEE PACKAGING CHOICES

data source USEPA	Steel Can	Rigid Plastic Container	Flexible Pouch
Package weight for 11.5 ounces of coffee	4	3	0.4
Recycling rate by consumer	72.5%	28.2%	0%
MSW landfilled after recycling (lbs./100,000oz of coffee)	598	1171	217
Packaging GHG emissions, lbs. CO2e/11.5oz of coffee	0.77	0.28	0.05
GHG benefit of packaging recycling, lbs. CO2e/11.5oz of coffee	-0.45	-0.16	-0.02
Packaging net GHG emissions, lbs. CO2e/100,000 oz. of coffee	3,800	1,996	413
Packaging energy consumption, MJ/11.5oz of coffee	7.5	11.5	0.9
Energy benefit of packaging recycling, MJ/11.5oz of coffee	-5.0	-9.4	-1.3
Packaging net energy consumption, MJ/100,000 oz. of coffee	33,489	76,721	7,722

# CONCLUSION:

- Packaging is a particularly complicated area
- Behavior change is crucial to recycling
- Extended producer responsibility does not change packages or individual recycling behavior
- Extended producer responsibility creates a monopoly that controls collection and processing of traditional recyclables

# FOR FURTHER INFORMATION

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- Chaz Miller's career in waste and recycling spanned four decades with stints at the US EPA Office of Solid Waste, the Glass Packaging Institute and the National Waste and Recycling Association. He testified on waste and recycling issues at Congressional and state hearings and spoke at conferences throughout North America. He was a plenary panel speaker at the UN Zero Waste Conference in Tokyo and spoke at a paper recycling conference in China. He is a member of the Maryland Recycling Network Board and an ex officio member of the Board of the Northeast Recycling Council and Chair of the NERC-NEWMOA Recycling Markets Committee.
- He speaks and writes often on extended product stewardship. Most recently he wrote Recycle British Columbia's Extended Producer Responsibility for Packaging and Paper: An Assessment of Its Impact. His paper, "From Birth to Rebirth: Will Product Stewardship Save Resources", was named Best Paper at the 19<sup>th</sup> Fall Meeting (2011) of the American Bar Association Section of Environment, Energy and Resources.
- Although he is now retired from full time work, he consults and continues to write his award-winning column "The Circular File" for Waste360 and to speak at waste and recycling conference in the United States and Canada. He was recently named Chair of the Montgomery County, Maryland, Aiming for Zero Waste Task Force.