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**Date:** October 8, 2019

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CC: **Mike Ferrant**, Committee Assistant

**From**: Martin Wolf
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**RE**: Testimony to the Single Use Products Working Group

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## Purpose of Testimony

On behalf of Seventh Generation, thank you for this opportunity to testify on policy or requirements that the State should enact to:

(A) reduce the use of single-use products;
(B) reduce the environmental impact of single-use products;
(C) improve statewide management of single-use products;
(D) divert single-use products from disposal in landfills; and
(E) prevent contamination of natural resources by discarded single-use products.

Collectively, these are the "Objectives."

## Introduction

Seventh Generation is the nation's leading brand of household and personal care products designed to help protect human health and the environment. Established

in 1988, our Burlington, Vermont based company employs over 150 people, distributing products to natural food retailers, supermarkets, mass merchants, and online retailers across the United States and more than 20 other countries.

Among the products manufactured and sold by Seventh Generation are laundry detergents, dish detergents, hand soaps, recycled household paper products, baby diapers, baby wipes, and period care products.

In October 2016, Seventh Generation was acquired by Unilever, a global manufacturer of consumer products dedicated to making sustainable living commonplace.

In presenting this testimony, I come before you as the Director of Sustainability & Authenticity for Seventh Generation, with responsibility to develop frameworks for more sustainable and socially responsible products, businesses, .and systems of commerce.

## The Framework: Creating a Circular Economy

### *Sustainability*

The United Nations Commission on Sustainable Development defined *sustainability* as *the ability to meet today's needs without diminishing the ability of future generations to meet their needs.*

To achieve this goal of sustainability it is necessary that the resources we have today be available tomorrow and for future generations of tomorrows.

### *The Linear Economy*

The current economic model of extraction, production, distribution, use, and **disposal** is not sustainable. Resources are finite, both as supply and as repositories for disposal. Simply put, we cannot continue to do what we are doing and expect to meet the five Objectives set forth for this Working Group.

### *The Circular Economy*

The five objectives set forth for this Working Group can only be met if Vermont transitions away from an unsustainable linear economy to a sustainable one, to an economy without waste.

Nature has demonstrated an economic model that is sustainable, that has met the needs of succeeding generations of life for nearly 4 billion years. That model is the ***circular economy.*** That economic model consists of extraction, production, distribution, use, and **reutilization**. It is often said that there is no waste in Nature. Every output of every creature is utilized in some way to create a resilient, sustainable, waste-free system. To create a sustainable, waste-free economy in Vermont, we must adopt Nature's system of circular economy in which nothing is a waste and everything is reutilized.

**Reutilization** means that every product or package can either be **reused** (a stainless steel water bottle, for example) or **recycled** (a PET water bottle that is recovered and reprocessed to produce a new water bottle), or if biobased **composted** (biodegraded).

Importantly, this does not mean we lose the convenience and utility of using a package or product only once. Rather, it means the **incentives** and **infrastructure** are in place such that **every single use package or product is recovered after use and reutilized**.

## Creating a Circular (Zero Waste) Economy in Vermont

Achieving a zero waste economy in Vermont will require actions by government (state and local), businesses (materials manufacturers, product manufacturers, retailers, and restaurants), and citizens. Following are some recommendations this Working Group should consider to help meet the five Objectives set forth above.

### *Create Uniform Policies and Requirements*

First and foremost, the Legislature should establish policies and requirements for reutilization (reuse, recycling, or composting) of all materials sold into commerce in Vermont.

Policies and requirements should be uniform across jurisdictions. This will result in improved ease of compliance by businesses and reduced consumer confusion.

Vermont should engage with other states to create uniform policies and requirements across as many jurisdictions as possible, reducing burdens on businesses and reducing consumer confusion.

### *Make Recycling Easy*

Clearly label which materials should be collected for reutilization.

- Require bold, easily readable marking on recyclable plastics.
    - Consider requiring a blue color stripe with a large number 1 or 2 on the bottom of plastic bottles, cups, and other ***readily*** recyclable products, easily visible to consumers. The color could match blue collection bins, cluing where to place the product or package for recycling.
    - Consider requiring a yellow color stripe on less recyclable products, easily visible to consumers, that could match yellow collection bins.
- Require bold, easily readable marking on recyclable plastic films
    - Consider requiring a white color stripe on recyclable plastic films, easily visible to consumers, that could match white collection bins.
- Require bold, easily readable marking on compostable plastics
    - Consider requiring a green color stripe on compostable products, easily visible to consumers, that could match green collection bins.
- Require bold, easily readable marking on single use products that cannot be reutilized.

- Consider requiring a black color stripe on non-reutilizable products, easily visible to consumers, that could match black trash bins.

### *Create Incentives to Reutilize Materials*

Policies and requirements should incent retail businesses to offer only reusable, recyclable, or compostable products and packaging

- Require retailers and restaurants to take-back single use products they offer or sell to consumers (straws, stirrers, cups, etc.)
  - Consider charging a fee to establishments that do not implement takeback programs
  - Use the fee to offset the cost of takeback programs at compliant establishments
- Retailers and restaurants should be charged an additional fee for offering or selling items that are frequently found as litter (single use drink cups, food containers, etc.)
  - Fees can be applied to programs to remove litter

Policies and requirements should incent manufacturers to provide reusable, recyclable, or compostable products and packaging

- Require fees on non-reusable or non-recyclable products and packaging
- Offer reduced fees for post-consumer recycled (PCR) content

Consider expanding the Bottle Bill to require deposits on ***all*** single use beverage containers including juice containers and water bottles.

### *Maintain the Value of Recyclables*

Pure materials have a higher value. Keep readily recyclable Resin Code 1 and 2 plastics separated rather than comingling with other less recyclable plastics. Mixing materials so they have to be separated at a materials recovery facility makes no sense. Nature (entropy) works against such a system.

### *Avoid Toxic Chemicals in Materials That Are Reutilized*

Expand Act 188 to include single use packaging and products. This will help prevent toxic chemicals such as PFAS, phthalates, lead, and cadmium from contaminating recycled materials.

### *Make Single Use Products Easy to Sort At Material Recovery Facilities*

He same color stripe that clues consumers how to recycle could be machine readable to facilitate automation at material recovery facilities. Having individuals stand on ladders and manually pick bottles from a conveyor does not seem like a 21st century solution to materials recovery.

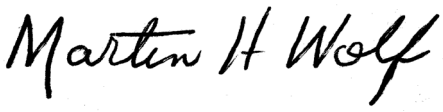
## Conclusions

The recommendations presented here may not meet Objective (A), reduce the use of single use products. However, they will fulfill Objectives (B) reduce the environmental impact of single-use products, and Objective (E) prevent contamination of natural resources by discarded single-use products, by increasing rates of utilization of packaging and products after their first use, thus keeping them out of the environment.

These recommendations will also fulfill Objective (C) improve statewide management of single-use products and Objective (D) divert single-use products from disposal in landfills, by making it easier for consumers to identify how to recycle materials and by maintaining a higher value for recovered materials.

Thank you for your attention to, and consideration of, these comments.

Respectfully submitted,



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