

3 December 2019

*Electronic Delivery*

Members, Single-Use Products Working  
Group,  
State of Vermont

***In re: Suggestions to the Single-Use Products Working Group to bolster recycling in Vermont.***

Dear Members,

On behalf of the American Chemistry Council (ACC), thank you for this opportunity to comment on steps the State of Vermont may consider to bolster recycling. Members of ACC's Plastics Division manufacture the basic material building blocks used to create a wide range of plastic products.

### **Summary**

Consider public policies that encourage:

- Investment in recycling technology; and
- Residential and commercial recycling, including steps to increase awareness and engagement, proper recycling practices, and recycled content demand.

### **Background**

**Industry efforts to control litter, enhance recycling, reduce waste, and conserve resources.** The industry continues to be a champion of litter education and prevention, waste minimization and recycling programs nationwide and appreciates the opportunity to provide input to the Working Group.

ACC and its members have a long history of investing in and supporting recycling. Through its Flexible Film Recycling Group (FFRG), ACC began the Wrap Recycling Action Program (WRAP) a partnership with US EPA, the Sustainable Packaging Coalition and several states. This initiative aims to increase opportunities for residents and businesses to recycle flexible plastic film including consumer and commercial product wrap; bags for groceries, produce and bread; and other common items like food storage bags and shipping pillows. Recycled film can be used to manufacture products such as durable outdoor lumber for decks and fences, and new packaging materials.

*ACC also has sponsored several projects in the Northeast including Save the Bay Narragansett Clean Up Day and litter reduction program; Green Up Day in Vermont; and Northeast Recycling Council (NERC) conferences.*

Our membership increasingly embraces sustainability and recognizes consumers' desire to recycle, and we welcome additional opportunities to pursue recycling and recovery initiatives. In recent years, ACC has ramped up engagement and leadership in national and international programs with these goals. For example, ACC participates in the following:

- Co-Leader of Operation Clean Sweep, which helps makers, shippers and users of plastic pellets to contain and prevent them from entering the ocean and waterways
- Founding partner of The Recycling Partnership, a national recycling nonprofit dedicated to improving curbside recycling



- Founding partner and sponsor of Keep America Beautiful “I Want to Be Recycled” campaign to increase consumer awareness and participation in recycling
- Supporter of Closed Loop Ocean, designed to fund waste infrastructure solutions in Southeast Asia
- Member of Ocean Conservancy’s Trash Free Seas Alliance with the goal of advancing scientific rigor on marine debris, exploring solutions and increasing public understanding

In addition to these efforts, ACC and its members helped launch the Alliance to End Plastic Waste. This new non-profit organization is committing \$1.5 billion over five years to help end plastic waste in the environment and is focusing on providing solutions to the largest sources of plastic in our ocean.

**Plastics.** Chemistry and plastics are an important and growing part of our state and national economy. Plastic materials manufacturers directly employ approximately 57,600 people in the US. These employees earned on average \$93,600 which is more than 44 percent higher than the average wage for all industries. Including product manufacturing, the plastics industry employs nearly 1 million people nationwide. Here in Vermont the industry accounts for 717 direct and 717 related jobs.

Plastics also provide important *benefits* to society. For example, the use of plastics helps reduce the weight of our cars saving fuel and greenhouse gas (GHG) emissions. Plastics also help keep our food fresh and clean reducing food waste. For example, the use of 1.5 grams of plastic wrap can extend the freshness of cucumbers for 14 days, compared to 3 days without, and packaging for grapes can reduce spoilage by 20 percent. Reducing food waste is important because US Environmental Protection Agency (EPA) estimates that more food reaches landfills and incinerators than any other single material in our everyday trash, constituting 22 percent of discarded municipal solid waste<sup>1</sup>. And the United Nations Food and Agriculture Organization reports that food waste is the third largest source of greenhouse gas emissions.<sup>2</sup>

Additionally, producing our food uses 10 times more energy than producing the packaging to protect it. An important study looking at the environmental costs of plastics across 18 sectors of our economy found alternatives would increase environmental impacts by nearly 4 times<sup>3</sup>. And a separate study analyzing alternatives to plastic packaging in food applications concluded that use of the alternatives would double greenhouse gas emissions<sup>4</sup>. Thus when we consider the role of plastics in society, we must undertake a more comprehensive analysis and also consider food waste and the impacts of alternatives to plastics.

**Market disruption.** As the Chinese economy grew, China’s industrial consumption for scrap materials, like plastics, increased 50 and 70 percent over the last decade. In fact, by 2017 Chinese buyers were importing almost a third of US scrap and similar volumes from Europe. However, over the past several years, China began to enact policies that banned Chinese buyers from importing scrap plastics and other materials.

The most recent policy, known as China Sword, requires such low contamination rate that it is effectively a ban on recycling imports to China of mixed paper and plastics.

This fundamental market shift has created a need to develop domestic demand for these valuable resources. While temporarily disruptive, current conditions do create an opportunity for lawmakers to

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<sup>1</sup> (AMERIPEN, 2018)

<sup>2</sup> (Nations 2011)

<sup>3</sup> (Lord, 2016)

<sup>4</sup> (Associates 2018)

examine public policies and programs to ensure we make the most out of our resources by making a fuller commitment to recovery and recycling in the US.

**Circular economy.** In May 2018, ACC’s Plastics Division announced its goals that crystalize US plastics resin producers’ commitment to the circular economy:

- 100 percent of plastics packaging is re-used, recycled or recovered by 2040; and
- 100 percent of plastics packaging is recyclable or recoverable by 2030.

ACC supports the pursuit of a more *circular economy*, one that prioritizes resource conservation and efficiency, design innovations that enable longer product lifespans, and reuse, recycling and recovery technologies that allow us to capture the greatest value from materials that have traditionally been discarded.

### **Public Policy Consideration**

Below are recommendations to help bolster Vermont’s recycling system. Some of these suggestions may require public policy directives, others may be best implemented by creating incentives or creating guidelines.

**Economic development.** Reframe recycled items as valuable feedstock that create jobs. Work with commerce and economic development departments to develop markets for feedstock. Consider the South Carolina Commerce Department approach<sup>5</sup>.

**Recycling center.** Washington State created a “recycling center”<sup>6</sup>. The center facilitates research, but also contracts with the third parties to provide direct “market-maker” activities and directly support the private and public sector. It also has a special focus developing markets. This seems similar to the Northeast Resource Recovery Association in Vermont. However, it may be worth reviewing the new Washington State center to see if there are areas to amplify the Association’s work<sup>7</sup>. Also consider partnering with organizations like The Recycling Partnership to bolster local recycling programs<sup>8</sup>.

**Return to retailer programs<sup>9</sup>.** Consider partnering with ACC to implement a return to retail program like WRAP<sup>10</sup>. This program encourages residents to return film to participating retailers.

In Connecticut, WRAP is helping the state meet its 2024 goal of diverting 60 percent of material from landfilling. A public education and consumer outreach program in Greater Hartford resulted in a 11 percent increase in bags brought to store collection and 7 percent of other plastic films (e.g. bread bags, dry cleaning bags, etc.) Contamination of items collected decreased by 23 percent and public awareness about what to take back to retailers grew. There was a 10 percent increase in the number retail customers that reported that they “always” or “most of the time” take film back to retail collection to be recycled.

**Recycling technology investment.** Consider if the state could eliminate barriers or create incentive investment in recycling technology. This might include:

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<sup>5</sup> (South Carolina Department of Commerce, 2019) various tax credits and incentives.

<sup>6</sup> (66th Legislature, 2019)

<sup>7</sup> (Ahn, Coleman, Ricchiuto, & Walton, 2019)

<sup>8</sup> (The Recycling Partnership, 2019)

<sup>9</sup> (PLASTICS Industry Association, 2019)

<sup>10</sup> (Flexible Film Recycling Group, 2019)

- *Infrastructure investment.* Work with industry, state and local government sources, etc. on directly funding infrastructure build-out and development.
- *Foam grant.* Consider seeking a grant from the<sup>11</sup> Foam Recycling Coalition (FRC). Launched in 2014, FRC was created to support increased recycling of foodservice packaging made from foam polystyrene. In order to meet this objective, the FRC shares general information on foam recycling, provides technical resources and offers funding assistance to programs ready to start or strengthen post-consumer foam recycling.
- *Demonstration projects.* Based on studies or belief where recycling infrastructure could be improved, fund demonstration projects or proof of concepts to confirm feasibility. For example, ACC is a sponsor of a Secondary Sorting Pilot project in the Pacific Northwest<sup>12</sup>.

**Recognition.** Recognize public and private purchase of recycled content through programs sponsored by state and local governments and other nonprofit organizations. EPA assists organizations developing programs based on EPA's existing programs and guidelines.

**Procurement.** Consider adopting guidelines<sup>13</sup> to encourage public and private procurement of sustainable products and products with recycled content.

**Waste audits and policy.** State sponsorship of waste audits to better understand and publish the state's waste stream. Studies and ensuing policy should be both material neutral and consider the full environmental impact of items to avoid regrettable substitutions. Washington State recently created the Recycling Center within the Ecology Department to improve markets and better educate residents.

**Industry engagement.** Continue industry engagement and engagement with other parts of the value chain. Consider hosting regular meetings and publishing discussion drafts for public comments.

**Uniform recycling guidelines.** Urge the adoption of uniform recycling guidelines in order to maximize communications, education, and economies of scale for recyclers. This could also be a platform to encourage best practices such as appropriate moisture reduction or making deposits that recycling bin size appropriate.

Again, thank you for this opportunity to provide this information to the committees. If you have any questions or if I may be of further service, please feel free to contact me at 202-249-6614 or [Adam\\_Peer@AmericanChemistry.com](mailto:Adam_Peer@AmericanChemistry.com).

Best regards,



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<sup>11</sup> See video at (Materials Recovery for the Future, 2019)

<sup>12</sup> (American Chemistry Council, 2019)

<sup>13</sup> (US Environmental Protection Agency, 2019)

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