



November 12, 2014

Ms. Cynthia Dunn
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Dear Ms. Dunn:

The American Chemistry Council (ACC) appreciates the opportunity to comment on the “CalRecycle Packaging Workshop Background Paper: Increasing collection and recovery of packaging in California” (Background Paper). ACC’s Plastics Division represents manufacturers of plastic resin in the United States. We have considerable expertise in the recovery of plastic packaging and have sponsored many studies on plastics recycling,¹ contributed to recycling solutions,² and implemented programs designed to increase plastic recovery in California.³

ACC is also one of 60 associations, from 34 different countries, that have made public commitments to work together in six different areas to bring about sustainable solutions to combat marine litter.⁴ To date, the implementation of these commitments includes more than 185 projects which range from beach clean ups, to the expansion of waste management capacities, and education campaigns. In California, for example, we placed over 700 recycling bins on state beaches and parks and organized an educational program for San Diego-area school-aged children to promote a positive environmental ethic and ensure a lasting awareness of the importance of the environment and recycling.

We support the goal of recovering 75 percent of California’s waste. However, we believe this goal can only be achieved if CalRecycle takes a comprehensive look at public and private partnerships and emerging technologies that can collectively help the state reduce the amount of material disposed of in landfills. To that end, ACC urges CalRecycle to adopt the following recommendations:

1. Focus on voluntary programs and public/private partnerships first. These initiatives can be undertaken now, without the need for divisive legislative debate or controversy, to avoid those approaches that may be ill-suited for packaging or result in unnecessary and burdensome regulations on small businesses and consumers.

¹ See <http://plastics.americanchemistry.com/PlasticPublications#recycling> to access studies on plastics recycling and recovery.

² ACC is a founding member of the “I Want to be Recycled” campaign, and a sponsor of the Curbside Value Partnership and the Wrap Recycling Action Partnership (WRAP).

³ Programs to increase plastic recovery in California include, “Plastics. Too valuable to waste. Recycle.sm” See, <http://www.2valuable2waste.com/our-programs/>.

⁴ The Declaration of the Global Plastics Associations for Solutions on Marine Litter: Progress Report – 2014, <http://plastics.americanchemistry.com/Education-Resources/Publications/Progress-Report-2014.pdf>.



2. Consider opportunities to dramatically increase recycling of recyclable plastics, including non-bottle rigid containers and polyethylene film. More than 85% of Californians have access to non-bottle rigid container recycling,⁵ so there is tremendous growth potential here. ACC welcomes a discussion on partnership opportunities to further increase the recovery of this material.
3. Explore opportunities to work with the Sustainable Packaging Coalition, ACC, the State of Wisconsin and brand owners in the Wrap Recycling Action Program to increase recognition of how to recycle polyethylene film.⁶ Recyclable polyethylene film is collected for recycling with plastics bags through many “at store” collection programs, which can be bolstered through partnerships.
4. Utilize integrated approaches including source reduction, mechanical recycling, composting, energy recovery, and new conversion technologies that transform plastics back into feedstock and/or fuel. Converting non-recycled plastics back into feedstock and fuel offers significant potential environmental and economic benefits.⁷ The Background Paper mentions other energy recovery technologies but fails to consider energy recovery as part of a possible long-term policy approach.⁸

In addition to these high-level comments, ACC will provide more detailed comments at and following the workshop. Thank you for your consideration of our feedback. We look forward to attending the workshop and partnering with Cal Recycle to reduce the amount of landfilled plastics. Should you have any questions, please do not hesitate to contact me at 916-448-2581 or tim_shestek@americanchemistry.com.

Sincerely,



Tim Shestek
Senior Director, State Affairs

⁵ Moore Recycling, Plastic Recycling Collection: California Reach Study, July 2011.

⁶ For more information on WRAP, see http://www.plasticfilmrecycling.org/wrap/wrap_home.html.

⁷ See the following fact sheet and corresponding economic study on the economic potential for plastics-to-oil technologies in the U.S.: <http://plastics.americanchemistry.com/Stand-Alone-Content/ACC-Economic-Potential-PTO-Fact-Sheet-Sept-2014.pdf>; and <http://plastics.americanchemistry.com/Stand-Alone-Content/Economic-Impact-of-Plastics-to-Oil-Facilities.pdf>.

⁸ Municipal solid waste that is currently sent to U.S. landfills represents a tremendous potential for the conversion of waste into energy to help boost energy security, reduce landfill waste and lower greenhouse gas emissions. See, <http://www.americanchemistry.com/Policy/Energy/Energy-Recovery/The-Power-of-Waste.pdf>.