

February 22, 2016

Via Email
Ms. Cynthia Dunn
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Dear Ms. Dunn:

The American Chemistry Council (ACC) appreciates the opportunity to provide additional comments regarding the California Department of Resources Recycling and Recovery's ("CalRecycle's") January 5, 2016, Manufacturer's Challenge Packaging Workshop. We suggest that California could benefit from a more concerted focus on sustainable materials management as part of California's 75% Recycling Initiative, an approach that is also in line with the state's climate change initiatives, in order to better prioritize recycling efforts. The following comments highlight the method adopted by the State of Oregon that can serve as a model for California. Additionally, enclosed is a report specific to non-bottle rigid plastic recycling in California that provides insight to the types and volumes of rigid plastics processed at material recovery facilities in the state.

Changing the Lens: From Net Discards to Greatest Energy and Resource Savings

The "Oregon Plastics Recycling Assessment,"¹ ("Recycling Assessment") conducted by third party consultants, with input from an advisory workgroup, ultimately identified specific, practical options to recycle more plastic throughout Oregon. Prior to conducting the Recycling Assessment, the state's Department of Environmental Quality identified plastics as the material with the greatest opportunity to save greenhouse gas emissions and energy by recycling and recovery.²

Comprehensive and data-driven, the Recycling Assessment includes data ranging from disposal/recycling data, an overview of markets, review of sortation technologies, analysis of policies, analysis of private-sector involvement, to an estimation of the volumes of increased recovered plastics and related benefits. The Recycling Assessment recommended ten specific programs for increasing plastics recycled and also ranked these programs by their ease of implementation. Ranking in the top half for ease of implementation were programs to implement

¹ Available at <http://www.deq.state.or.us/lq/sw/docs/ORplasticRecovery.pdf>; the Assessment uses some of California's 2006 data; see e.g., p. 9.

² Materials Management in Oregon: 2015 Vision and Framework for Action, <http://www.deq.state.or.us/lq/pubs/docs/sw/2050vision/MaterialsManagementinOregon.pdf>.



a grocery store rigid plastics recycling program, a similar program but for restaurants, improving residential film drop-off, and, instituting a strong commercial film recycling program.

An example of the outcomes from the Recycling Assessment, is the finding that “implementing all of the identified initiatives has the potential to increase plastics recycling by up to 30,000 tons per year;” thereby, increasing the recycling rate by approximately 10% (from a 19% recycling rate to 29%) in Oregon.³ Following the completion of the Recycling Assessment, Oregon is in the process of a waste composition study, a waste sort, and hired a new staff person to implement recommendations specific to recovering more plastics.

Additionally, in order to fund the implementation of “Oregon: 2050 Vision and Framework for Action,” the state legislature passed a law to increase the tipping fee surcharge. One of the most dynamic elements of implementation is the transition to measuring environmental outcomes rather than the existing weight-based approach.

Sustainable materials management, using life cycle analysis as a tool to evaluate the full range of potential environmental impacts (e.g., GHG emissions, energy, water, etc.) is consistent not only with other states’ approaches but also with the approach of the U.S. Environmental Protection Agency.⁴ We encourage CalRecycle to consider Oregon’s approach as a model for a California plastics recovery assessment. Greater use of sustainable materials management principles could help the state to prioritize where recovery will offer the most significant environmental, social, economic and performance benefits.

Sincerely,



Emily Tipaldo
Director, Packaging

ATTACHMENT: Non-Bottle Plastic Recycling in California, April 2015 Report

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Tim Shestek, Senior Director, ACC (Tim_Shestek@americanchemistry.com)

³ Available at <http://www.deq.state.or.us/lq/sw/docs/ORplasticRecovery.pdf>, p. 4.

⁴ See e.g., <http://www.epa.gov/smm>

