



November 19, 2014

Ms. Cynthia Dunn
Senior Environmental Scientist
Department of Resources Recycling and Recovery (CalRecycle)
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via email Cynthia.Dunn@CalRecycle.ca.gov

Subject: Supplemental Comments to CalRecycle's Packaging Workshop November 13, 2014

Dear Ms. Dunn:

SPI: The Plastics Industry Trade Association thanks you for convening the workshop last week and would like to provide supplemental comments in response to the Department's request for further information on voluntary activities undertaken. Following are some examples of SPI's activities.

1. Public-Private Partnership: PET Thermoform Recovery Pilot

SPI, in collaboration with the National Association of PET Container Resources (NAPCOR), undertook three pilot projects aimed at establishing model programs for the collection and intermediate processing of PET thermoformed packaging. SPI provided funding and NAPCOR provided technical assistance. Through a competitive process, grants were awarded to Montgomery County Maryland, Department of Environmental Protection; Firststar Fiber, Inc., Omaha, Nebraska; and the Pennsylvania Recycling Markets Center, Inc., serving residents in Elk and Lebanon counties. Programs were rolled out in 2012. Results have been encouraging and collections continue. This material is too valuable to waste. For more information on these pilots please visit:

<http://www.plasticsindustry.org/Press/newsdetail.cfm?ItemNumber=13513>

2. Healthcare Plastics Recycling

SPI is partnering with the Healthcare Plastics Recycling Council (HRPC) to address the one million tons of non-infectious, high-quality medical plastic destined for landfills. The goal of the project is to identify recyclable medical plastics, detail their financial value, and facilitate their entry into

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the recycling stream, which will help advance the zero waste goal of SPI by diverting these plastics away from landfills.

SPI and HRPC will partner with a recycler and a hospital and begin collecting materials in the second quarter of 2015. The project will address challenges such as segregating or single-streaming recyclables, minimizing contamination, and developing contingency plans in case of contamination. The overall goals are to develop a business case for the economic and technical feasibility of implementation with a focus on understanding the volumes necessary to achieve success and developing a model for other hospitals to adopt.

For more information on the Healthcare Plastics Recycling Council please visit:

<http://www.hprc.org/> <http://www.plasticpackagingperspective.com/healthcare-plastics-recycling/>

3. Operation Clean Sweep®

OPERATION CLEAN SWEEP® (OCS) is an international product stewardship program designed to prevent resin pellet loss and help keep pellets out of the marine environment. SPI and its partner, the Plastics Division of the American Chemistry Council, promote the goal of zero pellet loss globally through a suite of best management practices, which manufacturers can employ to prevent the errant release of pellets into the environment.

Every segment of the plastics industry has a role to play and is encouraged to take the pledge - resin producers, transporters, bulk terminal operators and plastics processors – by implementing good housekeeping and pellet containment practices.

For more information please visit <http://www.opcleansweep.org/>

4. Plastics Recycling Marketplace

SPI's "Recycle Plastics365" is a free, online marketplace that connects buyers and sellers of scrap plastics materials and recycling services. Intended to increase the recycling rate of plastics, the marketplace allows anyone to shop and price compare on offerings from competing suppliers in: the equipment sector; pre-industrial and post-consumer resin materials; scrap purchasers and sellers; logistics support and more. Open "24/7" the marketplace is an easily accessible, one-stop shopping venue for the recycling community and other stakeholders.

For more information visit <http://plasticsrecyclingmarketplace.com/>

5. Recycling Partnership

SPI has joined with the Curbside Value Partnership to help drive material recovery and meet sustainability goals. Best practices are promoted to achieve material recovery. A few examples include: Committed Communities who provide ample access and opportunity for recovery expansion; Public-Private Partnerships to coordinate across sectors; Policies that recognize the value of the entire recovery supply chain; Ongoing education of the entire supply chain to boost participation; and more.

Curbside Value Partnership has a proven track record that utilizes public-private partnerships to improve recycling at the local level. A principal goal is to make recycling more convenient for all consumers and to support community recycling programs in their efforts to be more accessible and more efficient. The full recycling supply chain is engaged; from local government to industry end markets, haulers, material recovery facilities, and converters.

For more information visit <http://www.recyclecurbside.org/the-recycling-partnership/>

We thank you again and should you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jane A. Adams".

Jane A. Adams
Senior Director, State Government Affairs

cc: Joe Ackler, Sacramento Consultant