



April 23, 2020

Martin Suuberg  
Commissioner  
Massachusetts Department of Environmental Protection  
1 Winter Street  
Boston, MA 02108

**Re: In Support of Massachusetts' Beverage Container Deposit Program**

Dear Commissioner Suuberg,

On behalf of our trade associations and member companies, we write to highlight the critical role Massachusetts' beverage container deposit program plays in supporting essential manufacturing business operations, and to ask that the program continue to provide beverage container redemption and return options for consumers, with safety measures and other appropriate protocol in place.

Beverage container redemption programs, **including Massachusetts', provide critical inputs and feedstock for essential manufacturing businesses and their customers** (food and beverage companies), as recognized in all guidance and updates, issued by the Department of Homeland Security's Cybersecurity and Infrastructure Agency (CISA).

In addition, the Coronavirus Guidance for America highlighted our essential customer bases;

*"If you work in a critical infrastructure industry, as defined by the Department of Homeland Security, such as healthcare services and pharmaceutical and food supply, you have a special responsibility to maintain your normal work schedule."*

We ask the Department of Environmental Protection consider the following, with respect to the beverage container deposit program:

1. Clear communication to consumers and all stakeholders that the beverage container redemption program has not been repealed and remains state law. Our organizations have developed an infographic (accompanying our letter), that your Department is welcome to use as appropriate.
2. Publication of an online resource, with updated information on return and/or redemption options, openings and similar hours adjustments, and any other temporary changes made in response to COVID-19. Over the past few weeks, purchasers of Massachusetts' recycled bottle bill materials have seen significant volume decreases, with one company reporting an 85% decline. An online resource could help capture more of the material currently being lost.

## **Recycled Materials as Part of the Essential Manufacturing Supply Chain**

We understand the significant pressure on the redemption, retail and grocery outlets, as they keep pace with customer demand, and at the same time, protect the health of their workforce. As organizations representing essential manufacturing companies that supply food and beverage packaging to our customers, our member companies are also addressing and adjusting to these challenges.

To date, all local and state executive orders regarding businesses have recognized food and beverage manufacturing companies, along with their supply chain partners, as essential businesses and operations. This supply chain for food and beverage companies includes companies and programs that collect, process and otherwise handle recyclables across the country.

Beverage container deposit systems generally account for 20-60% of our collective materials input batch, and Massachusetts is a key beverage container deposit state. The high quality of recyclables collected and purchased by our industries from these programs require very little sortation and can go quickly back into our manufacturing processes. Simply put, as our industries have ramped up production to meet unprecedented demand for packaged food and beverages, a strong, dependable supply chain of recycled material is essential.

Thank you for your consideration of our request.

**Tom Dobbins**



President and CEO  
Aluminum Association

**Robert Budway**



President  
Can Manufacturers Institute

**Scott DeFife**



President  
Glass Packaging Institute

**Darrel Collier**



Executive Director  
National Association for PET  
Container Resources

Cc: The Honorable Maura Healey, Massachusetts Attorney General  
Mr. Greg Cooper, Director, Massachusetts Department of Environmental Protection