



December 4, 2020

U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20004

**Re: Comments on the Draft National Recycling Goal and Objectives - EPA-HQ-OLEM-2020-0462**

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On behalf of the Glass Packaging Institute (GPI), and in follow up to our comments submitted on October 5<sup>th</sup>, I am pleased to provide additional feedback on the EPA's Draft National Recycling Strategy, framework and key objectives. GPI is the primary North American trade association for the glass container (food and beverage) manufacturers, glass recyclers, suppliers of raw materials, equipment and other elements that comprise the glass container industry.

Domestic glass container manufacturing companies purchase over 2 million metric tons of recycled glass annually, which is mixed with other raw materials, to produce 26 billion bottles and jars each year. The average glass food or beverage containers consists of roughly 1/3 recycled glass. Greenhouse gas emissions are reduced 6-8 percent for every 10 percent used, and reductions in energy use for that same percentage are 2-3 percent.

GPI supports Administrator Wheeler's goal of increasing the recycling rate to 50% nationwide by 2030. In our comments, we have outlined avenues and considerations that should be taken in account in order to achieve a higher recycling rate, bring more recyclable material back to manufacturing end markets, and reduce the overall landfill disposal of recyclables. Our comments are structured under the three stated priorities outlined by the EPA in the notice.

**Objective 1: Reduce Contamination in the Recycling Stream**

For glass recycling, reducing contamination within the recycling stream is a top priority. The challenge of contamination in the recovery of recyclables has continued to grow over the past two decades, with the prevalence of single-stream (one-bin) recycling utilized in the majority of communities with residential recycling agreements. It is important to remember that decreasing contamination helps improve the value of all materials in the stream, and is critical to address both the inbound contamination from the consumer and the residual contamination from the material recovery facility to end-markets.

While consumer education regarding what is (and is not) accepted in their particular community for recycling is important to provide from both an industry and local government perspective, the greater challenge lays within the recycling system itself, as we highlight in the second objective.

**Objective 2: Increase Processing Efficiency**

*Investment and innovation are needed to increase the efficiency of materials processing infrastructure and create a more resilient recycling system.*

GPI agrees that investment to improve the recycling infrastructure is very much needed, and is a significant obstacle confronting our efforts to procure more quality recycled



glass. It is not a matter of recyclable quantity, but rather *recyclable quality*, that largely determines which materials makes their way to an end market, and which materials are landfilled or similarly disposed.

With the general downturn in the recycling markets the past three to five years, grants, low interest loans and other investments in the recycling infrastructure at the state, local and federal level would greatly assist in the purchase of equipment required to properly sort out recyclables destined for materials recovery facilities (MRF). These investments are also job creation opportunities, as we know that recycling a ton of glass creates 10 times the jobs than landfilling the glass creates. We are strong supporters of federal legislation (RECOVER Act), which would provide financial assistance for stakeholders to upgrade/purchase sorting equipment, providing more recycled glass (and other recyclables) for manufacturing and other end markets.

*Develop and implement national recycling system definitions, measures, targets, and performance indicators.*

While the EPA has long gathered statistics on material/packaging generation, recycling and landfill disposal, there are other metrics that can and should be developed to measure true progress in recycling systems.

As referenced, a primary challenge for the glass industry is the sorting of recyclables at the MRF. Recycled glass sent from the MRF to a glass beneficiator for further clean-up can often contains up to 50% non-glass residue (solid waste and other recyclable materials). Measuring MRF output, *and in coordination*, consideration of output based MRF standards for accepted recyclables would be very helpful in measuring what is - and what is not - being recycled.

### **Objective 3: Improve Markets**

*Increase manufacturing use of feedstocks in the regions where they are generated.*

Recycled glass is a key component of the creation of new containers. GPI is currently focused in several regions of the country, identifying paths and avenues to more locally collect and sort recycled glass. Improving the quality of the glass collected in these areas across the country will greatly improve its chances of being used at nearby glass container plants. We encourage the EPA to broaden this section to include transportation challenges. GPI would be happy to assist in any way possible, as well as participate in future discussions with the Administration and other stakeholders as the next steps are put into place to achieve the 50% recycling goal.

Thank you for your consideration of our comments, and your efforts to tackle the opportunities and challenges in front of the recycling and recycling-connected industries.

Sincerely,

A handwritten signature in black ink that reads "Scott DeFife". The signature is written in a cursive, slightly slanted style.

Scott DeFife  
President