



October 2, 2020

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

Re: Comments on the EPA's National Recycling Goals and Metrics

The Glass Packaging Institute (GPI) is pleased to provide the following feedback regarding the EPA's review of recycling goals and measurement metrics.

Domestic glass container manufacturing companies purchase over 2 million metric tons of recycled glass annually, which is remelted, along with 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.

Recycling systems and metrics are important to glass manufacturing companies, glass recycling processors, brands and other companies in our supply chain. Please see our comments below (*italicized* under each bullet), on key metrics outlined by the EPA.

Recycled Commodity Contamination: The percentage of contaminants in out-bound recycled commodity materials such as paper, plastic, glass and metals.

Understanding this element is key to improving recycling systems, and may aid in getting more recyclables to glass and other end markets. The "out-bound" contamination rate (for our industry, the "recycled glass") delivered to glass processors is often contaminated up to 50% non-recyclables and solid waste.

This has several cross-cutting and negative impacts – it gives the false impression that glass is not recyclable, not worthy of recycling, and has little to no value. Understanding these contamination rates, and how that contamination can be reduced would be helpful to the glass container and other manufacturing industries that depend on recycled materials. It would also provide a more accurate assessment on the state of the recycling industry.

Domestic Utilization: The percentage of recycled materials used domestically as compared to the amount exported.

Understanding the markets for recycled materials and where they are headed (domestic and international) is important. The glass container industry is by and large domestic in nature (from raw materials/recycled glass sourcing, to manufacturing and customer end markets.)

GPI is not opposed to recyclable exports to non-domestic end markets, but as the recycling industry has collectively witnessed, an abrupt halt to these end markets can have a devastating impact on overall recyclable commodity values. Knowing where recyclables end up after they are collected, sorted and eventually sold would provide a more complete picture.

Recycled Content: The percentage of recycled content within manufactured goods.

GPI believes this element is important (and often overlooked) as recycling programs around the country review options to increase recovery rates, and better understand the make-up of packaging handled in their system.

While GPI does not support mandatory recycled-content minimum requirements, (due to challenges in purchasing high quality recycled glass in equal fashion across the country), the glass container industry in Oregon and California (the only states with recycled content requirements for glass bottles and jars) consistently meets these mandates.

Commodity Value: The average per-ton value of post-processed recycled materials.

GPI cautions against trying to measure or report on any recyclable package against such a wide-ranging and vast metric. The prices paid

and costs incurred for recycled glass (and other recyclable commodities), will vary depending on investments made by the materials recovery facilities (MRFs), the local collection system, and what types of recyclables are accepted.

Processing Cost: The per-ton operating and capital costs for MRFs to receive, separate and prepare recyclable materials for end-user markets.

Similar to the above metric surrounding “commodity values”, we also have significant concerns on establishing a benchmark commodity metric for a recyclable’s processing costs. Again, the processing costs for the dominant recycling collection system (single-stream/curbside) largely depend on previous investments made in the MRFs and the recycling collection itself. Because of these variables, a metric reporting on the processing costs to any particular recyclable would be inaccurate and not entirely attributable to that package.

Finally, we’d like to comment on sustainable materials metrics (SMM), that several local and state governments are considering for incorporation into recycling measurement and the effectiveness of recycling programs.

The ability for SMM analyses to assign a value on the “end of life scenario” for much of the disposed packaging is missing (outside of traditional landfill and/or incineration). The impact and value assignment outside of these areas (for example, marine environment, waterways and similar), is not included or considered in these reviews.

Thank you for your consideration of our comments. GPI and its member companies look forward to additional opportunities to engage with the agency and all stakeholders on recycling-related issues.

Sincerely,



Scott DeFife
President