



October 14, 2016

Mr. Martin Suuberg
Commissioner
Massachusetts Department of Environmental Protection
One Winter Street
Boston, MA 02108

Mr. Matthew A. Beaton
Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Mr. Greg Cooper
Director
Massachusetts Department of Environmental Protection
One Winter Street
Boston, Massachusetts 02108

Dear Gentlemen:

On behalf of the Glass Packaging Institute (GPI), I would like to emphasize the glass container manufacturing industry's strong support for Massachusetts' beverage container recycling refund program (BCRRP).

GPI is the North American trade association for the glass container manufacturers, glass recyclers, and suppliers of materials, equipment and transport to the industry. Collectively, the industry directly employs nearly 20,000 Americans in glass container manufacturing and related recycling industries.

When glass plants can increase the levels of recycled glass as part of the overall batch mix, they can reduce furnace temperatures, resulting in reduced energy use and lower greenhouse gas emissions.

The glass and other beverage containers recovered through the Massachusetts BCRRP are of high quality, and in high demand by the glass container and other manufacturing industries. Collectively, the beverage container deposit program supports several hundred jobs at in-state redemption centers and related recycling businesses.

GPI member companies have a strong presence in Massachusetts. Ardagh Group, Glass – North America employs approximately 250 people and manufactures millions of glass bottles daily at their plant in Milford. They have also been recognized as one of only 70 manufacturing operations in the U.S. as ENERGY STAR® certified by the EPA for superior energy performance.

On average, the Ardagh Milford plant produces their glass bottles using 96% recycled glass in the manufacturing process. Strategic Materials, Inc. operates a glass recycling facility in Franklin, and processes much of the glass beverage containers recovered through the program. In 2013, Parallel Products opened a recovery and processing center in North Boston, sorting glass and other containers received from the program.

Soda ash is often substituted for recycled glass, in an effort to lower the furnace melting temperature at the glass plant. The closest source of soda ash is the Green River Basin in Wyoming, making the locally-sourced, high quality recycled glass in Massachusetts extremely valuable.

Between 65% and 80% of the recycled glass used in the glass container manufacturing process is sourced from the 10 states operating BCRRPs. **Elimination of the Massachusetts BCRRP would significantly decrease the quality of glass and all recyclables collected.** Up to 50% of the glass collected in a residential, single stream manner, will be sent to landfills for disposal, due to contamination and sorting challenges at the materials recovery facility.

According to analysis provided by the Container Recycling Institute (CRI), repeal of the Massachusetts BCRRP would cost the state and municipalities a collective combined \$435 million in revenue over a ten-year period, due in large part to the loss of unredeemed deposits, and would also result in the loss of 600 beverage container redemption center related jobs.

BCRRPs achieve on average much higher recovery rates for covered beverage containers. Redemption of containers within Massachusetts' program is 65%, more than twice the national average. A prime reason for the success of BCRRPs is that recovered containers are kept separate from other recyclables, drastically reducing contamination and providing the best opportunity for their return to a manufactured product. This also allows for more recyclables to be captured and reduces contamination in the existing single stream residential programs.

Demand for quality, recycled glass by the glass container and other manufacturers across the country are very strong, with available and ready markets. The glass container industry purchased 2.4 million tons of recycled glass in 2015, and has steadily increased the recycled content of its bottles and jars since 2009.

Delaware's BCRRP Repeal to Date Largely Ineffective

Delaware is the only state to have repealed their beverage container recycling refund program. The 5-cent refundable fee under the program became a 4-cent tax on consumers at the point of purchase, in an effort to fund statewide recycling programs.

With aluminum beverage containers exempted, Delaware's BCRRP had unusually low redemption rates. Less than 20% of all beverage containers sold in-state were included in the program.

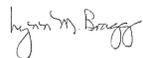
The result of Delaware's effort to increase recycling rates via single stream collection are decidedly mixed. While the overall increase in recyclable tonnage rose 1113,197 tons from 2010 to 2014, nearly half of that increase came from including compostable materials, hazardous waste, vehicle and large appliance recycling. This is considered "commercial recycling," and should not be confused and included with an increase in residential, curbside recycling that was funded in large part by the 4-cent per container tax.

Additionally, 11,000 tons of recyclables and non-recyclables that were collected, counted and included in the Delaware recycling rate were eventually landfilled due to contamination and sorting challenges. Glass too contaminated to properly sort at the MRFs accounted for roughly 30% of the 11,000 tons of material ultimately sent for landfill disposal.

Glass beverage containers recovered through beverage container deposit programs do not suffer this same fate, with approximately 98% headed to valued manufacturing end markets.

Please contact me to follow up if you have any questions or would like to discuss the Massachusetts BCRRP.

Sincerely,



Lynn M. Bragg
President