



September 9, 2019

Members, California State Senate
Members, California State Assembly

Testimony in Opposition to Senate Bill 54 & Assembly Bill 1080

The Glass Packaging Institute (GPI) respectfully opposes SB 54 (Allen) and AB 1080 (Gonzalez) because these bills unnecessarily include glass containers as part of a new regulatory framework, with little detail and unknown requirements. Glass containers are already a part of a long-standing recycling programs, have a high recycling rate, and are subject to mandatory minimum recycled content requirements, that have successfully made glass one of the most circular and sustainable packaging options in the state of California.

While the GPI supports the goals of the California Circular Economy and Pollution Reduction Act, the focus of the legislation should be reserved for packaging materials highlighted throughout the findings of the bill, as they are the leading causes of unmanaged waste and litter currently not subject to a recovery program.

The public policy rationale for SB 54 and AB 1080 is to create a circular packaging economy. Glass container recycling and manufacturing are already a closed loop, circular packaging commodity. They do not belong in the new regulatory framework, and, contrary to the intent of the authors, may jeopardize the sale and end-markets for glass containers.

Glass container manufacturers have been operating at a competitive disadvantage for years against packaging types not subject to the bottle bill and that do not pay processing fees. As a result, the glass container industry has lost market share to other packaging over the years. Rather than subject glass to more regulation, it is entirely appropriate to exempt glass containers from SB 54 and AB 1080, as currently drafted.

GPI is concerned over amendments added to both bills in the last week of the legislative session that give broad, new and fee regulatory authority to CalRecycle, without additional legislative approval. This authority would apply to all packaging types, no matter their recyclability, environmental attributes or regulatory fees already being paid.

GPI is supportive of the circular economy and has advocated for recycling systems and programs that would improve the quality and quantity of recycled

glass collected for the remanufacture of glass bottles in California and across the country. Members of GPI not only make glass containers, they are also the largest purchasers of recycled glass and comply with a statutorily imposed minimum recycled content requirement, highlighting our status as a closed loop packaging material.

On behalf of the Glass Packaging Institute and its union workforce members, we request a NO vote, unless both bills are amended to exempt glass containers.

Moreover, we recommend both bills be more fully considered in the next session, when all stakeholders will have had sufficient time to consider the legislation, numerous amendments and impact on all stakeholders.

Please reach out with any questions or comments you or your staff may have.

Sincerely,

Scott

Scott DeFife
President