



February 26, 2020

The Honorable Brownie Carson
The Honorable Ralph Tucker
Joint Environment and Natural Resources Committee
100 State House Station
Augusta, ME 04333

Re: Testimony for LD 2104 – Oppose as Drafted

Dear Chair Carson, Chair Tucker, and Members of the Committee:

The Glass Packaging Institute (GPI) offers the following comments for LD 2104, *An Act To Support and Increase the Recycling of Packaging*. For reasons outlined below, we oppose the legislation as drafted.

GPI is the North American trade association for the glass food and beverage manufacturing companies, glass recycling and other partners and suppliers to the industry. The industry works closely with local and state governments throughout the country on issues surrounding sustainability, recycling, energy and greenhouse gas emissions goals and mandates.

Glass Container Recycling Background

The glass container manufacturing industry has a significant stake in the effectiveness of glass recycling programs. Recycled glass is a key component of the manufacturing process. For every 10% of recycled glass included in the manufacturing process, energy costs can be reduced 2-3%. A corresponding reduction of plant greenhouse gas emissions also occurs when increasing levels of recycled glass are used to produce new containers.

The domestic glass container industry purchases 2.3 million tons of recycled glass each year, Recycled glass also constitutes a significant part of residential curbside recycling, and by weight can be anywhere from 15-25% of the total volume.

Maine’s existing bottle-deposit recycling program creates high glass recovery rates, glass that is generally free of contaminants and in high demand from the two primary end users, the glass container and fiberglass industries. The 2017 redemption rate of 84% demonstrates its tremendous success.

LD 2104 - Readily-Recyclable Definition and Corresponding Costs

A core concern for GPI within LD 2104 is the definition of “readily recyclable”. This definition, and any packaging that qualifies as such, would be assessed lower per package fees for its producers and (aka brands).

As a 100% and endlessly recyclable package (with an average recycled content rate of over 30%) conventional wisdom would place glass into that category. However, the

definition of “readily recyclable” is almost exclusively tied to the packaging’s commodity resale value from in-state single stream recycling operations.

Compounding this issue, is that the commodity resale value from glass beverages covered under the state’s bottle bill (since exempt from LD 2104), would not be counted toward this metric.

Glass' value is greatly diminished in the majority of single stream collection streams, including operations in Maine, due to ongoing and present challenges with recyclable sorting systems.

Under the cost and fees connected with LD 2104, our customers/brands (who like many, have multiple packaging options for their food and beverage products), would be given a financial incentive to switch packaging, away from glass. This places our industry at the mercy and prioritization of business decisions made by the recycling industry, and other companies associated with collection and sorting (whether they private or public). Any packaging fees assessed should be fair across recyclable commodities and categories.

Additionally, single stream materials recovery facilities (MRFs) and the broader hauling community should adhere to quality standards for glass and other core recyclables. Markets for recyclables headed through these MRFs would much stronger across the board, if the quality of the recyclables sorted was higher. We support efforts to provide investments and matching grants to assist MRFs in upgrading equipment, however, such resources should be tied into measurable results and standards. These standards should meet manufacturing specifications for their end market destinations.

While LD 2104 does include an alternative collection proposal to assist in offsetting some of these EPR connected costs, government approval, customer perspective and logistics surrounding collection approaches within Maine localities needs to be better outlined, prior to GPI being in a position to support.

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

Sincerely,



Scott DeFife
President