



Comments to the Connecticut Task Force to Study Methods for Reducing Consumer Packaging that  
Generates Solid Waste  
June 21, 2017

Dear Chairman Flower, Chairman Bell and Members of the Task Force:

The Plastics Industry Association (PLASTICS) appreciates the opportunity to offer its comments to the Task Force regarding consumer packaging in the solid waste stream. We commend the efforts of the Task Force to find the most efficient, cost-effective way to divert packaging from the waste stream in Connecticut.

PLASTICS is a diverse manufacturing trade association that supports the entire plastics industry supply chain, representing nearly one million workers in the \$418 billion U.S. industry. Since 1937, PLASTICS has been working to make its members and the industry more globally competitive while advancing recycling and sustainability. Products of the plastics industry are utilized in most every sector of the economy. Examples include agriculture, automotive, construction, medical, packaging, semi-conductors, energy exploration, recreation and sports, automotive, aerospace, electronics and more.

The role of packaging is more important than ever with more goods continuing to be introduced to market as well as the ease of purchase through e-commerce. Effective packaging uses only as much of the right kind of material as necessary to deliver what is required. That said, as packaging is reduced, the risk for product damage or loss exceeds the savings from using less packaging material. Any reduction in packaging beyond that point is a false benefit, since it increases the total amount of waste.

Two principal drivers of all types of packaging (design) are the product itself and the consumer. Well-designed packaging meets the requirements of the product while minimizing the economic and environmental impacts of both the product and its package. The basic functions of packaging are prevention of damage; loss; spoilage; contamination; tampering; and theft.

PLASTICS is active in supporting recovery efforts of all types of plastics and participates in a number of initiatives that attempt to educate consumers and spur dialogue among stakeholders about effective practices.

We have developed a program for our members called the "Zero Net Waste" program. Members learn how they can turn their waste into valuable resources, or eliminate waste altogether using a tool-kit developed for the program. The aim is to divert up to 90% of their total waste from a landfill hence avoiding those costs and potentially generating revenue by recycling. PLASTICS was a leader in a recently concluded pilot Healthcare Plastics Recycling Project which recovered 100 tons of pre-patient, non-infectious plastic from seven hospitals.

We were an inaugural funder of and continuing supporter of the Recycling Partnership, a public-private partnership that focuses on improving and expanding access to recycling across the country. The Partnership helps find ways to reduce contamination in waste streams, supports the use of carts to increase targeted recyclables recovery and boosts participation in collection services



by educating consumers. PLASTICS sponsored work undertaken by the Sustainable Packaging Coalition which helped identify strong areas of recycling and where more focus is needed.

We are supporters and funders of the Material Recovery For the Future (MRFF) program, a research collaborative working to make all flexible plastic film recyclable curbside and in residential recycling programs. On this note, PLASTICS commends Connecticut for launching a plastic film recycling initiative earlier this year in cooperation with state retailers. All of this film is a valuable raw material for potential use in new products.

An effective way to reduce consumer packaging in the waste stream is to educate consumers of the proper means of recycling and products that can be recycled. PLASTICS supports education and outreach campaigns that influence behavior related to reduce, reuse and recycling practices.

It is also important to ensure that access to recycling is made available at public spaces and areas of multi-family residences. Here, where multiple users of packaging congregate for special events or live permanently, recyclable material can and should be easily collected and recovered. There is a great opportunity to drive recovery of used packaging from consumers who are gathered in small or large densely populated areas as long as a collection and recovery system is developed.

Proposals such as "Pay As You Throw" may be an option for consideration as it helps consumers be conscious about their disposal habits and assist in material diversion. Consumers are still provided the benefits of packaging, but are encouraged to reduce, reuse or recycle that material instead of immediately disposing of it. This market-based approach between the haulers and consumers establish a fair price for the disposal of waste while reducing the amount of recyclables and contamination in the waste stream.

The Task Force may wish to look at the U.S. Environmental Protection Agency's Sustainable Materials Program activities and objectives which address advancing the sustainable use of materials throughout their lifecycle to minimize waste and environmental impacts.

The Closed Loop Partners program provides investment support for scaling recycling infrastructure, sustainable consumer goods, and research and development initiatives. The projects they have undertaken and supported could be viewed as replicable models for various communities and locales. We encourage the Task Force to learn from this work being done.

Again, we appreciate your efforts given to this issue and thank you for the opportunity to offer our views on ways to increase the diversion of packaging from Connecticut's waste stream.

Sincerely,

A handwritten signature in black ink, appearing to read "Jane A. Adams". The signature is fluid and cursive, with a large, sweeping "J" and "A".

Jane A. Adams

Senior Director, State Government Affairs

[jadams@plasticsindustry.org](mailto:jadams@plasticsindustry.org)

cc: Ussawin Robin Bumpen, Committee Clerk