

Bumpen, Robin

From: Alison Keane <akeane@flexpack.org>
Sent: Friday, August 25, 2017 12:31 PM
To: Katie Reilly
Cc: Bumpen, Robin
Subject: RE: Connecticut Task Force
Attachments: 08-21-17 Final Dunn Table 1 Multi Layer Summary without \$ value (001).xlsx

Hi Katie – FPA’s response is below and some information is attached. I am cc’ing Robin so that it goes into the record.

FPA testimony stated that “Single material flexible packaging, which is about half of the flexible packaging waste, can be mechanically recycled through store drop-off programs. The other half can be used to generate energy feedstock, whether through pyrolysis, gasification or fuel blending.”

This is, in fact, the case. Please see the attached study quantifying the amount and types of flexible packaging that can be recycled versus those that cannot – this was done in 2012 by PTIS, a Division of HAVI Global Solutions Direct, LLC as part of a Segment Profile Report for FPA. The analysis indicates that 49% of total flexible packaging (based on weight) is currently difficult to mechanically recycle – the rest can be. Note, there is no FTC or other requirement that the packaging that can be recycled be labeled through the SPC program. While FPA recommends the SPC “How2Recycle” label and they have created a special label for store-drop off program; it is a purely voluntary labelling program and not mandated or even endorsed by the FTC.

In store drop-off programs for our single material flexible packaging accept grocery, bread, zip-top and dry cleaning bags as well as outer-wrap for many products, such as paper plates, napkins, bathroom tissue, diapers, and more and packaging pillows used in e-commerce. These packaging materials are then bulked and made into plastic pellets for use in new bags and wraps. Promoting these products as recyclable complies with the FTC Green Guides because programs to recycle such are available to a substantial majority of consumers or communities where the products are sold. As FPA also stated in our testimony – recommending continued and increased awareness of these programs and the materials they accept is a practical solution and one that could make a big dent in reducing the amount of solid waste going to landfill and increasing the amount going for recycling.

Here are some good resources:

Plastic Film Recycling (WRAP) program: <https://www.plasticfilmrecycling.org/recycling-bags-and-wraps/>

Plastic Industry Organization (American Plastic Bag Alliance) program: <http://www.plasticsindustry.org/apba/recycling>

Both of these programs have zip code locators where you can drop packaging off for recycling.

Video of one recycling facility making it into new resin and new bags: <http://novolex.com/sustainability>

Thank you for the opportunity to expound on our testimony and clarify the question raised.

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From: Katie Reilly [<mailto:KReilly@cta.tech>]

Sent: Friday, August 18, 2017 11:15 AM

To: Alison Keane <akeane@flexpack.org>

Subject: Connecticut Task Force

Hi Alison –

Hope all is well! I'm finishing up the notes from the July meeting of the Connecticut Packaging Task Force.

During the Q&A, you and Victor had the below exchange:

Chairman Bell: According to the Federal Trade Commission (FTC), the only items considered recyclable under the FTC definition are the single-stream returned to retailer that has label from Sustainable Packaging Coalition (SPC). This does not include PVC film, PLM film, candy wraps, etc. It is strictly only LDPE and HDPE wraps. Would like you to correct in your presentation.

Ms. Keane: Not my understanding and they don't have the have the SPC label at this point. I will look at that and get back to the Task Force.

Just wanted to remind you of the follow-up in the event it makes sense to follow-up. No pressure – just sending a quick note.

Thanks!

Katie Reilly | Senior Manager, Environmental and Sustainability Policy

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MM lbs Basis

Note: Case I considers Sleeve labels as Hard to Recycle
Case II considers Sleeve labels as Recyclable

Composition of U.S. Flexible Packaging Industry 2012 (mm lbs)[Figure 3]

