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Testimony of the Flexible Packaging Association For the Connecticut Task Force to Study Methods for Reducing Consumer Packaging that Generates Solid Waste

July 19, 2017 10am to 12:30pm DEEP Headquarters, Gina McCarthy Auditorium, 79 Elm Street, Hartford, CT 06106

Thank you for the opportunity to testify at this task force meeting. I am Alison Keane and I am the President and CEO of the Flexible Packaging Association (FPA). FPA is the voice of U.S. manufacturers of flexible packaging and their suppliers. The Association's mission is connecting, advancing, and leading the flexible packaging industry. Flexible packaging represents over \$30 billion in annual sales in the U.S., and is the second largest and fastest growing segment of the packaging industry. The industry employs over 80,000 workers in the United States. Flexible packaging is produced from paper, plastic, film, aluminum foil, or any combination of these materials, and includes bags, pouches, labels, liners, wraps, rollstock, and other flexible products. These are products you and I use every day - including food and beverage products such as candy, salty snacks, yogurt, and beverages; as well as health and beauty items and pharmaceuticals, such as aspirin, shampoo, and shaving cream. Flexible packaging is also used for medical device packaging to ensure that the products packaged, such as absorbable sutures, human tissue, and artificial joints, maintain their sterility and efficacy at the time of use. Even packaging for pet food and treats uses flexible packaging to deliver fresh and healthy meals to a variety of animals.



End-of-Life Management

FPA understands the importance of reducing and recycling solid waste to minimize litter and optimize landfill space. There is no single solution that can be applied to all communities when it comes to the best way to collect, sort and process flexible packaging waste. Viability is influenced by existing equipment and infrastructure, material collection methods and rates, volume and mix, and demand for the recovered material. 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. Developing other end-of-life solutions is a work in progress and FPA has partnered with other manufacturers, recyclers, retailers, waste management companies, brand owners, and other organizations to continue making strides toward total packaging recycling. This project is call the Materials Recovery for the Future or MRFF project.

The mission of the MRFF project is simple – flexible packaging material is recycled and the recovery community derives value from it. The project has piloted tweaks to current materials recovery facility (MRF) infrastructure to help establish methods and equipment protocol for flexible packaging. This year the project intends on doing a full-scale demonstration. The results of this could be used by MRFs across the country. The project is also working on downstream uses for the materials. As the report states, analyzing the economics of recycling flexible packaging is just as important as proving the technical capacity to separate and process this material. In short, it is a work in progress and while final results will not be in within the timeframe for recommendations from the Task Force – there is great work being done and the Task Force report should reserve flexible packaging materials from any recommendation unless and until collection, recycling and end-use markets for these materials are commercially viable. In other words, don't put the cart before the horse and give industry the opportunity to solve the recyclability issues – flexible packaging is the newest form of packaging and a small percentage by weight and volume of the solid waste stream – we can afford to wait and get it right.

In the meantime, Dow also has a program called the EnergyBag program, which is making strides in collection and recovery of flexibles and utilizing energy recovery solutions for end-of-life management. Energy recovery often has a negative connotation, when in reality, it should be an option in any sustainable recycling system. As one of the primary goals of recycling is to reduce solid waste going to landfills and to derive benefit from collected materials – energy recovery solutions are rightly on the hierarchy of materials management and should not be disregarded when recommending solutions. I believe the Task Force has already heard from Dow, but to reiterate some of its points, the Omaha, NE Hefty EnergyBag program now has voluntary participation from 8,500 households and has collected 13,000 orange bags of material equaling about 6.5 tons since it was launched in September 2016. The first program, a pilot in Citrus Heights, CA, proved the theory, with 1/3 of targeted homeowners participating, approximately 8,000 EnergyBags collected in three months and 512 gallons of synthetic crude oil produced. The program also cuts down on contamination of other material streams by separating out the flexibles. Dow is set to expand the program with grants to new interested communities as well as guidance for municipalities to mimic its success on their own. Energy recovery is a viable option for flexible's and should be included in any report.

<u>Sustainability</u>

There is a reason only 50% of flexible packaging is mechanically recyclable. 50% is single material. The rest is multi-material for a good reason – to create less waste in the first place. Not all flexible packaging is the same – different products require different types of protection. Multiple materials are required to provide the appropriate barrier and protection to prevent contamination, extend freshness and ultimately protect the product by providing puncture, tear and burst resistance and strength. When assessing sustainability or examining the full life-cycle of packaging, flexible packaging wins hands down. Flexible packaging uses fewer resources, generates fewer emissions and creates less waste. Flexible packaging starts with using fewer resources and has the ability to package the most product in the least amount of packaging possible, reducing energy use in manufacturing and transportation.

For example, producing a flexible food service pouch require 75% less energy and generates just 1/10 of CO2 emissions during production than a metal can for the equivalent amount of product. 1.5 pounds of flexible packaging will package the same amount of beverage or liquid as 50 pounds of glass. Advancements in materials and production processes have reduced the weight of some flexible packaging by up to 50%. And a recent study by the Natural Resources Defense Council shows that up to 40% of food in the U.S. is wasted – flexible packaging reduces this waste by preserving the shelf-life of food. Bananas last 36 days in perforated polyethylene bags versus 5 days unpackaged and the shelf-life of beef is extended from 4 days to 30 days when vacuum packed in oxygen barrier film. These are just two of numerous examples where flexible packaging is helping to reduce food waste. Flexible packaging does the same for brick and mortar retail and e-commerce – by protecting and preserving the product during shipping and transportation, less waste and returns are

generated. Even when disposed of, flexible packaging has the advantage of having less waste than other packaging types.

Consumer Engagement

Lastly, we need consumer engagement and programs like the Sustainable Packaging Coalition's "How2Recycle" label, to inform residents of the opportunities to recycle. Most grocery stores and other retailers provide receptacles where consumers can easily deposit plastic bags, dry cleaning bags, bread bags, protective pillows and films and other product wrapping, that most consumers do not know about. In fact, before taking this job 9 months ago, I did not know the extent of the store drop-off recycling programs. Now I know, my family knows, my neighbors know and my hair dresser knows. Educating and encouraging consumers to make environmentally-conscious decisions about single material flexible packaging 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. The Task Force report should recommend a robust consumer education and outreach component to go along with any recommendations for end-of-life management.

Conclusion

In conclusion, the Task Force is looking for some specific policies and programs that will help consumers reduce the amount of packaging they create and for reducing consumer packaging that generates solid waste. FPA believes that instead, the Task Force should be promoting policies and programs that look at the entire life-cycle of packaging and that give credit to packaging with a lower environmental footprint (regardless of end of life management options); that recognize energy recovery as a recycling option; and that promote what I call alternative infrastructures, such as store drop off programs and consumer labeling programs.

I believe the Task Force already has both the Battelle Study, from which many of my sustainability statics are cited as well as the MRFF report, information on the Hefty EnergyBag and the How2Recycle programs, however, I would be happy to provide more information and resources if requested.

Thank you.