

AMERIPEN Comments on CCSMM Questions

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Andy Hackman <AHackman@serlinhaley.com>

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To: DEEP RecyclingProgram

Cc: Dan Felton <DanF@Ameripen.org>; Nelson, Chris

AMERIPEN CCSMM Comments 10-15-20 - FNL.pdf

245 KB

Hello Chris and CCSMM members,

Per your request in the CCSMM forum, attached please find AMERIPEN's comments on the CCSMM questions. We truly appreciate the opportunity to comment. Also as indicated in the attached letter, we would welcome the opportunity to present or discuss with the group AMERIPEN's findings and work on recycling/recover financing concepts and models.

Respectfully submitted,

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October 15, 2020

Connecticut Coalition for Sustainable Materials Management (CCSMM)
Connecticut Department of Energy and Environmental Protection (DEEP)
79 Elm Street
Hartford, Connecticut 06106-5127
DEEP.RecyclingProgram@ct.gov

Re: AMERIPEN Comments on CCSMM Questions

Submitted via Email

To Whom It May Concern,

AMERIPEN – the American Institute for Packaging and the Environment – is writing to comment on the Connecticut Coalition for Sustainable Materials Management’s (CCSMM’s) Public Engagement Questions on solid waste and recycling. We support efforts to increase packaging recovery and are eager and willing to be included in meaningful discussions with the CCSMM to achieve the Connecticut’s goals.

AMERIPEN is a coalition of packaging producers, users and end-of-life materials managers dedicated to improving packaging and the environment in the Commonwealth and throughout the U.S. Our mission is to lead the packaging industry through advocacy based on science and to enhance understanding of the role packaging plays in a more sustainable society, economy, and environment. Our membership represents the entire packaging supply chain, including materials suppliers, packaging producers, consumer packaged goods companies and end-of-life materials managers. We have several members with facilities in Connecticut, and many more who import packaging materials and products into the State.

Our responses to the Public Engagement Questions are as follows:

1. Are there any model programs, best practices, or innovative concepts that the Coalition should consider, that could provide a scalable solution in any of the Focus Areas, listed above? The Coalition is interested in hearing about approaches that are conceptual, implemented on a pilot basis, or implemented at scale, whether here in Connecticut or in other jurisdictions in the United States or other countries.

Response: Regarding Item #3, Extended Producer Responsibility (EPR) for packaging, AMERIPEN has lead a deep evaluation on the future of packaging, exploring the impacts of major current trends like e-commerce and COVID-19 and how best to modernize our recycling system to respond to these changes. Existing proposals focus on funding the recycling system as it currently exists rather than the system needed in the future. AMERIPEN supports industry funding to advance meaningful packaging recovery in the U.S. for the future, with balanced support from the entire value chain to improve recycling and create a more circular loop for packaging materials. Existing models that have informed our proposed funding approach include Ontario’s Continuous Improvement Fund and the Australian Packaging Covenant. Here in the U.S., Colorado and Michigan’s NextGen Recycling models are offering some early stage promise. We would welcome the opportunity to present our findings and thoughts on financing to the CCSMM.

2. For any solution identified in Question 1, what are the barriers that need to be addressed in order to advance any of these solutions at scale in Connecticut?

Response: Barriers to financing solutions occur when recycling funds flow to a state's General Fund or non-dedicated accounts where funds are not used to support recycling and recovery and instead go toward general state needs or funding recycling systems based on how they exist today rather than what is needed for the future of the systems. AMERIPEN has seen examples of this in Florida and Washington with advance recycling fees and litter taxes.

- 2a. Are there different implementation considerations for full or partial "subscription" towns versus towns that provide for curbside collection of trash & recyclables?

Response: AMERIPEN supports ensuring that local recycling programs are flexible at the local level, depending upon needs in that community. However, if producer/industry funding is to be provided to a local system, that funding should be conditioned upon improvement to the recycling infrastructure and greater access to recycling.

- 2b. Is it necessary or beneficial for the solution to be implemented on a statewide, multi-town, or other regional basis, or can it be implemented successfully town-by-town?

Response: Statewide standards or benchmarks may become necessary to justify funding provisions to regional and local governments. Statewide benchmark recycling standards have been proposed in states like Michigan to allow funding to be provided to localities.

3. For any solution identified in Question 1, please describe the types of implications or benefits that the solution provides with respect to:
- a. Sustainability- environmental benefits,
 - b. Reducing costs

Response: Improving and increasing the efficiency of recovery and recycling systems and improving access to recycling and the quality of materials recovered has the potential to provide significant environmental benefits. However, any time there are new fees established and administration of the collection and distribution of those funds is implemented, there will be increased costs. Visible advanced recycling fees would be one way to show consumers the relationship between costs and industry funding into the recycling system.

4. Would you be interested or willing to present to the Coalition or a Coalition working group on solutions you've highlighted, or is there another speaker or organization that would be helpful for the Coalition to hear from on this topic?

Response: AMERIPEN would be very interested in presenting to the CCSMM our evaluation of financing options and our perspectives on industry funding for recycling systems.

5. DEEP can play an important role in advancing sustainable materials management solutions, including: issuing RFPs for long-term energy contracts to support anaerobic digestion facilities; providing grants for collection trucks powered by compressed natural gas (CNG) or electricity

through the Volkswagen settlement; employing different approaches to permitting innovative technologies; and streamlining permitting processes. Are there things that DEEP should do differently in its approach to any of the above roles/functions, that would better support sustainable materials management in Connecticut?

Response: AMERIPEN believes that investments, grants and incentives for research and development into new and innovative recycling and processing technologies in the State could position Connecticut as a leader in the Northeast for processing recyclables and creating new end markets for recycled materials. AMERIPEN would also caution that we should look across the material value chain to understand, particularly in the case of packaging, where impacts can arise above and beyond just recovery (ex: climate impacts, reducing food waste, ecommerce product protection, COVID safety and hygiene, etc.). Complementary policy support for things like composting, reusables and recycling guidance could help drive significant changes and increase the value and opportunity for companies to invest in alternative packaging strategies.

6. Are there any solutions that you would like the Coalition to know about that do not fit within the Focus Areas above?

Response: AMERIPEN continues to look at policy mechanisms such as landfill bans (with a plan), pay-as-you-throw and increased tipping fees as additional mechanisms that could also improve recycling systems.

7. Are there any aspects of the Focus Areas, listed above, that the Coalition should *not* consider (and if so, why)?

Response: AMERIPEN believes that if producers are to provide funding to recycling systems, an efficient approach that clearly works to modernize the system, while minimizing administrative costs and burdens, is critical. Wholesale adoption of Canadian style EPR systems in Connecticut, for instance, and a blank check municipal reimbursement model for solid waste (that includes payments for landfilling) is unlikely to deliver the holistic environmental outcomes we seek and will waste funds. A balanced approach where modernization and lifecycle impacts are incentivized will be key to any new recycling system funding solutions implemented in Connecticut.

AMERIPEN appreciates the opportunity to comment on the CCSMM questions on solid waste and recycling. As Connecticut seeks to update its solid waste policies, we encourage it to evaluate ways to increase access and participation in existing recycling systems while not supporting a costly EPR program for packaging that simply shifts uncontrolled costs to producers and will upend current recycling programs without improving recycling performance at all. Thank you for consideration of our comments and we would again welcome the opportunity to present to the CCSMM.

Sincerely,



Dan Felton
Executive Director – AMERIPEN