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American Institute for Packaging and the Environment (AMERIPEN)

Testimony in Support of Part 115 Amendments

&

Sustainable Recycling Goals

Michigan House Appropriations Subcommittee on Environmental Quality

March 6, 2018

AMERIPEN.org



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Our commitment to quality and innovation is reflected in our products and services.

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Representative Whiteford and Members of the Michigan House Appropriations Subcommittee on Environmental Quality,

The American Institute for Packaging and the Environment (AMERIPEN) appreciates the opportunity to comment on recycling and solid waste goals – as the Subcommittee begins to evaluate significant changes to Part 115 which are being developed by the Michigan Department of Environmental Quality (DEQ). This effort follows recommendations by the Solid Waste and Recycling Advisors and the Governor’s Recycling Council and ongoing stakeholder meetings. Specifically, AMERIPEN would like to comment on recycling and the benchmark recycling goals that are being developed as part of potential changes to Part 115.

AMERIPEN is a coalition of packaging producers, users and end-of-life materials managers dedicated to improving packaging and the environment. We are the only material neutral packaging association in the United States. Our membership is broad, representing the diversity of the packaging sector and its supply chains. We focus on science and data to define and support our public policy positions and our comments are based on this rigorous research rooted in our commitment to achieve sustainable packaging and efficient recycling policies. AMERIPEN has been participating in the DEQ stakeholder discussions since early 2017 and appreciates that DEQ has had an open and transparent process as the development of this legislative language has progressed.

AMERIPEN would like to express its support for the State’s efforts to develop a broader approach to materials management and to increase recycling in the State. AMERIPEN believes a focus on the full lifecycle of waste, as well as the adoption of a toolbox of approaches to achieve diversion, is the most effective approach to success. We are encouraged by the positive steps that the draft DEQ changes to Part 115 are making. AMERIPEN’s comments here are focused on the recycling and utilization goals that have been part of this Part 115 amendment effort. In addition, we wish to highlight some additional policies and programs that have been shown to increase recycling in other jurisdictions.

Recycling & Utilization Goals

Goalsetting is a critical activity to achieving and measuring environmental progress. DEQ’s SWRA process and stakeholder meetings have worked diligently to consider input from all parties. AMERIPEN supports DEQ’s goal to increase recycling to 30% by 2025. We also support the development of supplemental waste utilization goals, which may be a key part of a holistic approach to material management. DEQ has indicated support for a holistic approach through such waste utilization goals, and we continue to work with DEQ to ensure that the legislative language is flexible and accounts for positive environmental gains outside of sheer recycling tonnage targets that have constrained and challenged other states from California to Connecticut.



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Inclusion of waste utilization goals is so important because recycling tonnage goals alone overlook the light-weighting shift happening across America. The packaging industry has made significant strides in reducing the amount of material used over the past decade, but since recycling is commonly measured, by tonnage these efforts are hidden and the raw data suggests recycling may be declining.

For example, recycling one ton of PET bottles today requires 35,000 more bottles than it did a decade prior.¹ A ten-year study of recycled material in one U.S. city noted a 37 percent increase in materials when measured by cubic yards, but only an eight percent increase in cumulative tonnage.² Additionally, a study conducted by the Grocery Manufacturers (GMA)³ of 23 major U.S.-based consumer goods companies noted over 180 packaging improvement initiatives with approximately 80 percent of those initiatives focused on source reduction. In total, these projects were estimated to result in the avoidance of 1.54 billion pounds of packaging, representing an estimated 800 million pounds of plastic and over 500 million pounds of paper. Furthermore, approximately 50 percent of those projects reported efforts to increase recycled inputs in their packaging. This points out the common flaw with evaluating packaging recycling solely through a weight-based percentage goal, because it can look as if recycling is decreasing when in fact there is less material being used and in many cases, an actual increase in recovery rates. For this reason, AMERIPEN supports DEQ's journey to waste utilization goals in addition to setting feasible recycling goals that account for source reduction and the evolving modern solid waste stream.

Another flaw of weight-based goals is that they fail to consider the interplay and purpose of materials to understand where the best opportunities to mitigate overall environmental impacts may lie. This goes beyond just using waste, but determining the best environmental outcome along the entire value chain of materials.

For example, composting and anaerobic digestion results in a six to sevenfold increase in greenhouse gas emissions over preventing food waste in the first place.⁴ Packaging has been identified as one of the top three strategies to *prevent* food waste. Viewed from this perspective, some strategies to reduce and/or increase the recovery of packaging may inadvertently drive an increase in food waste through damage or reduced shelf life. A holistic view of waste generation shows the role materials and products play across the lifecycle, and helps evaluate where we can target constrained resources to enact the greatest outcome.

¹ Waste Management Media Room "[Recycle More? Or...Recycle Better?](#)" April 11, 2016

² Data from Waste Management

³ Grocery Manufacturers Association's Annual Report: <http://www.gmaonline.org/file-manager/2016%20Environmental%20Success%20Stories.pdf>

⁴ Oregon DEQ (2017) "[Oregon DEQ Strategic Plan for Preventing the Wasting of Food](#)"

NRDC (2017) "[Wasted: How America is Losing up to 40 Percent of its Food from Farm to Fork to Landfill](#)"

AMERIPEN will continue to work with DEQ to support holistic waste utilization goals and to encourage its inclusion in final legislative language that is presented to this Subcommittee later this Spring.

Support for Policies to Increase Recycling

National studies consistently find that there are several efficient and effective ways to increase recycling:

- 1. Universal Access to Recycling**
- 2. A Common List of Statewide Accepted Recyclables**
- 3. Use of Cart-Based Recycling Services**
- 4. Application of Statewide Pay-As-You-Throw (PAYT) Systems**

These are policies and programs that data have specifically demonstrated will increase recycling and change consumer behavior. AMERIPEN believes that these policies can be implemented in Michigan to help create highly functioning recycling programs in the state and we have provided input to DEQ to that would help incorporate elements of these policies and lay the groundwork for optimal recycling systems in Michigan.

Potential Public/Private Partnerships to Increase Recycling

AMERIPEN encourages Michigan to further explore two significant initiatives led by the private sector and designed to help increase and finance recycling systems across the State:

- ***The Recycling Partnership*** works to increase access and efficacy of municipal recycling programs. They offer financial support to place large recycling carts in communities which have been proven to increase the amount of recyclables collected as well as provide technical support to increase volume and reduce contamination. As the State seeks to increase access to single stream recycling, the Recycling Partnership can be an effective resource in identifying best practices and funding support.
- Funded by a consortium of leading U.S. employers, ***The Closed Loop Fund*** provides no-interest loans to communities and low-interest loans to private entities to help increase the capacity of recycling systems. They also evaluate opportunities and needs regarding recycling system infrastructure across the U.S. Current initiatives include a proposal to fund the development of an organics collection infrastructure and a number of initiatives to increase film plastics recovery.

Challenged by aging infrastructure and challenging solid recovery system, both programs are demonstrating significant impacts on increasing recycling and recovery



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Conclusion

AMERIPEN appreciates the opportunity to comment on the pending action to revise Part 115 and on the goals of solid waste policy in Michigan. As the State seeks to update its solid waste goals and policy structure we look forward to working with DEQ and this Subcommittee to find ways to increase access and participation in recycling programs and effectively prevent and utilize waste. We look forward to answering any questions that the Subcommittee has.