



August 17, 2020

Solid Waste Management Program
Department of Ecology
300 Desmond Drive SE
Lacey, WA 98503

Department of Ecology:

The Consumer Brands Association (Consumer Brands)¹ appreciates the opportunity to provide comments on Washington State's Plastic Packaging Study.

Consumer Brands champions the industry whose products Americans depend on every day. From household and personal care products to food and beverage products, the consumer packaged goods (CPG) industry plays a vital role in powering the Washington state economy, contributing \$45.6 billion to its GDP and 454,000 jobs. Consumer Brands advocates for uniform regulatory frameworks established from risk-based science that promote choice and build consumer trust across the sectors we represent.

Consumer Brands supports the objectives and scope of the plastics packaging evaluation and assessment. From conversations we've had with stakeholders across the packaging value chain through the [Recycling Leadership Council](#), it's clear that better data of material flows will inform which policy interventions can have the most impact on improving the recycling system. We commend Washington State's legislators and Department of Ecology for including the study and comment period as an important step in the process towards developing legislation.

The CPG industry is committed to packaging sustainability. Through packaging design, innovation, research and development, CPG companies are leading the way in reducing waste-to-landfill and improving the environmental footprint of packaging. In fact, all of the 25-largest CPG companies have made voluntary public commitments to recyclable or compostable packaging or to using increased recycled content by 2030, some as early as 2025². From shampoo bottles made from ocean plastic to toothpaste tubes made from paperboard, this sector is dedicated to innovative solutions that minimize packaging waste.

¹ Formerly the Grocery Manufacturers Association.

² Reduce. Reuse. Confuse. How Best Intentions Have Led to Confusion, Contamination, and Broken Recycling System in America: https://consumerbrandsassociation.org/wp-content/uploads/2019/04/ConsumerBrands_ReduceReuseConfuse.pdf

In the comments that follow, Consumer Brands will address each of the policy measures discussed in the report:

- Product or Material Disposal Bans
- Fees/Charge/Tax/Levy
- EPR Programs
- Minimum Recycled Content Targets
- Reusable Product Facilitation
- Multi-faceted Measures

Product or Material Disposal Bans

The CPG industry is committed to packaging sustainability. Packaging is critical to the safety and quality of the products Washingtonians rely on every day. However, packaging can be better, and the industry is committed to those improvements through innovation in materials and packaging design. By implementing product and material bans, that innovation will be stifled. Additionally, product or material disposal bans could lead to regrettable substitutions. For instance, single use plastics have received much criticism for their relatively low recycling rate. If they were banned, their replacements could be much heavier or use materials that are considerably more complex to recycle like wax coated paperboard. Heavier materials have a more significant greenhouse gas impact because of the extra weight during shipping.

Fees/Charges/Tax/Levy

There is a cost to creating a recycling system built for 21st century needs, but there is a vastly more substantial cost to doing nothing. Financing mechanisms must reinforce or drive desired behaviors of all stakeholders, the CPG industry included. It is critical that all generated funds be dedicated exclusively to improving the recycling system, enhancing recycling infrastructure or educating consumers. Washington should first evaluate and recommit existing revenue directed to the recycling system before any new fees or taxes are considered. Additionally, financing for a 21st century system should be a shared responsibility between multiple stakeholders.

EPR Programs

The challenges facing our recycling system and the consequences of packaging waste are serious, but they are also solvable. However, they cannot be solved by any one stakeholder alone. The circular economy model relies on each stakeholder to do their part. The CPG industry can control and influence packaging design, making it more recyclable, compostable, made of innovative materials or reusable. However, if we are to make real, lasting progress on reducing packaging waste to landfill, all stakeholders must participate and collaborate in building a system that works. Regulatory schemes like extended producer responsibility (EPR) put all of the responsibility on a single player, the consumer goods industry, without fixing the underlying system. Rather, we should be working collaboratively with every stakeholder toward the common goal of higher recycling rates, which can be achieved through improved infrastructure, sustainable financing models, more consumer participation and resilient and reliable end-markets for recycled material. Additionally, EPR programs tend to pull materials and resources

from existing infrastructure. Our focus should be on investing and standardizing our infrastructure, not segmenting it and creating further market inefficiencies.

Minimum Recycled Content Targets

The demand for post-consumer recycled content exists. The CPG industry, apparel, retail and other industries have made commitments to use significantly more post-consumer recycled content in their packaging and products. However, as it stands, there is only enough post-consumer recycled content to meet six percent³ of existing demand. The CPG industry has committed to making single use packaging recyclable or compostable by 2030, some as soon as 2025. However, ensuring that recyclable packaging actually gets recycled — put in the correct bin, collected, sorted and processed — is outside this industry's control. Recyclable material that is not recycled contributes to a significant shortage of some post-consumer recycled materials. This misalignment of supply and demand creates complications for the CPG and other industries, as companies make and work to meet significant commitments to using more recycled content. Sufficient levels of recovery are necessary to meet this surge in demand. We need new policies that support both the development and maintenance of strong end markets for recycled materials.

Reusable Product Facilitation

The CPG industry is leading the way in reusable packaging. Terracycle's Loop program, for example, allows consumers to purchase everyday household products like ice cream and laundry detergent from brands they know and trust in new, refillable packaging. Loop operates on the "milkman model" of delivery: a container is used at home, sent back empty and returned to the consumer full. This cycle can continue nearly in perpetuity, preventing the need for single-use packaging for those products entirely. The founding partners of Loop⁴ are some of the best-known CPG companies in the world, demonstrating this sector's commitment to a range of solutions to packaging waste and a complete reimagining of packaging away from single-use.

Multi-faceted Measures

Everyone has a role to play. From packaging suppliers to CPG companies, the waste and recycling industry to government, NGOs to consumers, each part of the recycling ecosystem must be willing to innovate, cooperate and change. As Consumer Brands' sees it, there is no silver bullet to fixing the recycling system. The solutions must be multi-faceted and incorporate every stakeholder in the value chain. The CPG industry is working to improve packaging design, considering environmental impact and sending a clear demand signal for recycled content to packaging suppliers. Consumer participation is critical to getting material to the waste and recycling industry. From there, the waste and recycling industry can take a leadership role in updating equipment regularly and developing new technologies to economically recover packaging. State and federal governments can invest in or incentivize market-based investments in recycling infrastructure, thinking beyond municipal borders toward harmonized, scalable systems rooted in best practices. Multi-faceted solutions are necessary to create real

³ [Advancing Circular Systems for Plastics](#), Closed Loop Partners

⁴ [Loop's launch brings reusable packaging to the world's biggest brands](#), GreenBiz

and lasting improvements to our recycling system because the range of stakeholders and opportunities is multi-faceted.

Consumer Brands outlined our perspective on the appropriate steps to developing a 21st century recycling system in our [Recycling Policy Platform](#).

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In summary, the Consumer Brands Association supports the review of market conditions and potential policy interventions to improve recycling in Washington state. Consumer Brands looks forward to further collaboration as the Washington Department of Ecology works to finalize the report and other recycling-related policy topics. This type of transparent and collaborative approach can result in innovative and practical solutions that help build a circular economy for products and packaging in Washington and across the United States.

Please do not hesitate to contact me for additional details or clarification. Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read 'M Stasz', with a horizontal line underneath.

Meghan Stasz
Vice President, Packaging and Sustainability