



May 24, 2021

The Honorable Stacy Brenner
The Honorable Ralph Tucker
Joint Committee on Environment and Natural Resources
100 State House Station
Augusta, ME 04333

Re: Testimony for L.D. 1541

Dear Chairs Brenner, Tucker, and Members of the Committee:

The Glass Packaging Institute (GPI) offers the following perspective and comments for L.D. 1541, *An Act To Support and Improve Municipal Recycling Programs and Save Taxpayer Money*. For the glass container industry, this legislation would primarily cover packaging for food products in glass.

GPI is the North American trade association for the glass food and beverage manufacturing companies, glass recycling and other partners and suppliers to the industry. The industry works closely with local and state governments throughout the country on issues surrounding sustainability, recycling, energy and greenhouse gas emissions goals and mandates.

Glass Container Recycling Background

The glass container manufacturing industry has a significant stake in the effectiveness of glass recycling programs. Recycled glass is a key component of the manufacturing process. For every 10% of recycled glass included in the manufacturing process, energy costs can be reduced 2-3%. A corresponding reduction of plant greenhouse gas emissions also occurs when increasing levels of recycled glass are used to produce new containers.

The domestic glass container industry purchases 2.3 million tons of recycled glass each year. Recycled glass also constitutes a significant part of residential curbside recycling, and by weight can be anywhere from 15-25% of the total volume.

Simply put, glass is a known recyclable, surveyed consumers consistently state their desire for glass recycling programs/options, and is currently recycled into new containers, fiberglass insulation and other products.

Maine's existing bottle deposit recycling program has high glass recovery rates, producing glass that is generally free of contaminants and in high demand from the two primary end users, the glass container and fiberglass industries.

The 2017 bottle deposit redemption rate of 84% demonstrates its tremendous success. Our industry values the quality recycled glass generated from Maine's bottle deposit program, and its high recovery rate showcases recycled glass' strong end markets.

L.D. 1541 Definitions and Fee Settings

A package's recyclability, and how recyclability is defined within any EPR program, is of importance to glass and other packaging substrates.

We appreciate that the amended version of L.D. 1541 removes arbitrary, subjective and inconsistent metrics from the definition of "readily recyclable" for covered packaging. These terms included "consistent market for purchase" and other definitions that vary over time, are largely dependent on recycling sorting capabilities, quality of the commodity leaving the facility, and had very little to do with the circular nature of the package itself.

From the glass container industry's perspective, "readily recyclable" should consider a package's reusability, ability to be re-washed and refilled, recyclability and recycled content. As the Department considers which packaging is recyclable, we ask that they keep these elements in mind.

Producer Fee Settings

Packaging-based industries in Maine and across the country regularly compete within material types (glass, aluminum, plastic, aseptic, multi-material, etc.) and among each other for food and beverage customer business. This is because our collective customers typically have many options for how they protect and package their respective products.

The producer fee settings in the amended L.D. 1541 appear to recognize the importance of fair fees for readily recyclable packaging. In addition to weight,

volume has been added as a fee metric assessment. With mismanaged waste, volume of units of discarded packaging is the key issue. As recently discussed in the Keep America Beautiful 2020 National Litter Study, the sheer volume of the most littered packaging materials (films, wraps and bags) overwhelms the system. These items are lightweight but far outnumber glass food containers, which are often reused for storage in homes after initial use. We encourage the Department to consider how volume could offer a counterbalance to weight-based metrics. This is important to glass, as fee settings based purely on weight provide distorted and outsized benefits to many of our packaging competitors.

Alternative Collection Option

Given that an EPR program for Maine would be primarily limited to food jars for glass, we are reviewing the legislative details, opportunities and potential for glass producers to efficiently and effectively set up alternative collection programs for their products. Much like the deposit material and drop-off glass, curbside glass would also have stronger end-markets if it had lower residual contamination from poorly equipped MRFs. We would appreciate the opportunity to review options with the state that meet the program outlined in the amended L.D. 1541.

Please feel free to contact me for with any questions, or to follow up on our testimony.

Thank you for your consideration of our comments.

Sincerely,



Scott DeFife
President

Scott DeFife
Glass Packaging Institute (GPI)

Please see the attached testimony from the Glass Packaging Institute (GPI) for the
5-23-21 amended L.D. 1541