

US EPA ARCHIVE DOCUMENT

## Final Report of the Dialogue on Sustainable Financing of Recycling of Packaging at the Municipal Level

### COMMENT SUMMARY

complete comments can be found at [regulations.gov](http://regulations.gov) under docket EPA-HQ-RCRA-2011-0912

#	<u>Received Date</u>	<u>Submitter</u>	<u>Comments</u>
EPA-HQ-RCRA-2011-0912-0003	1/23/12	Kate Bailey Eco-Cycle	EPA should facilitate EPR discussion
EPA-HQ-RCRA-2011-0912-0004	1/23/12	Leslie Tamminen 7 <sup>th</sup> Generation Advisors	EPA should focus on source reduction and littered packaging (plastic) and consider the following methods: <ul style="list-style-type: none"> <li>– Rio Declaration Principle 15</li> <li>– Establish target plastic packaging pollution</li> <li>– Develop a nationwide trash policy</li> <li>– Emulate CA Implementation Strategy</li> <li>– Use EPR and product stewardship strategies</li> <li>– Increase enforcement, measurements and bioplastics oversight</li> </ul>
EPA-HQ-RCRA-2011-0912-0005	1/26/12	Kirsten James Heal the Bay	<i>(submitted same comments as 7<sup>th</sup> Generation Advisors)</i>
EPA-HQ-RCRA-2011-0912-0006	1/31/12	Lisa Kaas, Esq Plastic Pollution Coalition	<ul style="list-style-type: none"> <li>• Strategies to REDUCE the amount of plastic waste generated are necessary to ease the burden of excessive waste</li> <li>• Recycling alone is not a solution <ul style="list-style-type: none"> <li>○ reopen analysis of all solutions to reduce packaging</li> <li>○ apply Rio Declaration Principle 15</li> <li>○ establish target reductions of plastic packaging</li> <li>○ develop a national trash policy</li> <li>○ emulate CA Implementation Policy</li> <li>○ apply EPR, product stewardship standards and green chemistry principles to achieve source reduction and redesign of packaging</li> <li>○ increase monitoring and enforcement</li> <li>○ do not substitute one problem for another</li> </ul> </li> </ul>

			<ul style="list-style-type: none"> <li>○ coordinate with international organizations</li> </ul>
<i>EPA-HQ-RCRA-2011-0912-0007</i>	2/01/12	Steve Pittenger	Please reduce packaging not just recycle it!
<i>EPA-HQ-RCRA-2011-0912-0008</i>	2/06/12	Bruce J Parker, NSWMA	<ul style="list-style-type: none"> <li>● the report contains numerous errors of fact, unsupported assertions and fails to understand how recycling collection is funded</li> <li>● overlooks recycling taking place in the private sector</li> <li>● ignores contributions by scrap recycling industry</li> <li>● the recycling rate is not stagnant – it is increasing</li> <li>● subscription service discussion contains incorrect information</li> <li>● recycling companies should have been included in the dialogue which would have avoided these errors</li> </ul>
<i>EPA-HQ-RCRA-2011-0912-0009</i>	2/8/12	Hilary Collins, Colorado Product Stewardship Council (CoPSC)	<ul style="list-style-type: none"> <li>● EPR plays a significant role in resource conservation and preservation of environmental and public health hazards at every level</li> <li>● the full cost internalization has the greatest potential</li> <li>● disappointed that the proposed projects do not discuss potential funding – and hopes EPA or other packaging industry interests will devote resources</li> <li>● encourage EPA to analyze future funding mechanisms</li> <li>● encourage EPA to further consider ways EPR can prevent waste</li> </ul>
<i>EPA-HQ-RCRA-2011-0912-0010</i>	2/9/12	Lynn M Bragg, Glass Packaging Institute (GPI)	<ul style="list-style-type: none"> <li>● GPI, as well as materials processors and handlers, waste haulers and recycling companies and other end market manufacturers that purchase recycled materials – did not participate in the dialogue but should be included in any future dialogues</li> <li>● Experiences of EU EPR systems ought to be explored further in on-going industry dialogues</li> <li>● the glass container industry remains an active stakeholder to ensure continued success of beverage container refund programs</li> <li>● Container Recycling Institute (CRI) report cited, specifically the job creation in beverage container refund programs</li> <li>● Comments on project recommendations: <ul style="list-style-type: none"> <li>○ the glass industry would like to work with other stakeholders in</li> </ul> </li> </ul>

			<ul style="list-style-type: none"> <li>○ a material sorting project (Project 5)</li> <li>○ GPI sees value in Project 6 – Aftermarkets</li> <li>○ the glass industry would consider sharing recycling data for Project 7 – Recycling Rate by Material Type</li> </ul>
<i>EPA-HQ-RCRA-2011-0912-0011</i>	2/9/12	Bill Smith, Northwest Product Stewardship	<ul style="list-style-type: none"> <li>● the dialogue could and should have remained true to the original intent (sustainable financing)</li> <li>● suggest the EPA devote more time and research to financing and continue to analyze future funding mechanisms</li> </ul>
<i>EPA-HQ-RCRA-2011-0912-0012</i>	2/9/12	Laurie G Davis, Washington State Department of Ecology	<ul style="list-style-type: none"> <li>● discussion of optimization detracted for the original purpose of the dialogue and focus on financing</li> <li>● encourages EPA to further analyze financing options</li> <li>● suggests EPA devotes more time to research funding mechanisms</li> <li>● believed the dialogue missed deeper analysis of EPR</li> <li>● hopes EPA will continue with this effort</li> </ul>
<i>EPA-HQ-RCRA-2011-0912-0013</i>	2/9/12	Cheryl Lohrmann, Create Plenty	<ul style="list-style-type: none"> <li>● support endeavors to reduce and reuse waste</li> <li>● the cost of recycling is greater than the value of the recycled content</li> </ul>
<i>EPA-HQ-RCRA-2011-0912-0014</i>	LATE 2/16/12	Lisa A Skumatz and Juri Freeman, Skumatz Economic Research Associates (SERA)	<ul style="list-style-type: none"> <li>● the report does not provide a summary assessment or recommendation on strong performers</li> <li>● funding of recycling systems in the private/commercial sector are not well discussed</li> <li>● certain stakeholders seem omitted from the discussion group</li> <li>● lack of some citation</li> <li>● more discussion/explanation needed on some topics to clarify intention</li> </ul>