



October 26, 2018

Maryland Department of the Environment
Land and Materials Administration
Resource Management Program
1800 Washington Boulevard, Suite 610
Baltimore, MD 21230

Re: Comments on Maryland’s Waste Reduction and Resource Recovery Plan Goals and Metrics Recommendations, September 2018

On behalf of the Glass Packaging Institute (GPI), I am offering the following comments to **Maryland’s Waste Reduction and Resource Recovery Plan Goals and Metrics Recommendations** (referred throughout our comments as “the recommendations”), developed in response to Governor Hogan’s 2017 Executive Order, “Waste Reduction and Resource Recovery Plan for Maryland.”

Background

GPI is the North American trade association for the glass container manufacturers, glass recyclers, and suppliers of materials, equipment and transport to the industry. Our member companies produce the vast majority of US food and beverage glass containers purchased in grocery stores and retail outlets. Collectively, the industry directly employs 18,000 Americans in glass container manufacturing and glass recycling companies throughout the country.

GPI member companies both process (clean up) and purchase recycled glass collected from municipal programs in Maryland, and across the Mid-Atlantic region. On an annual basis, glass container manufacturers purchase 2.4 million tons of recycled glass nationwide. Recycled glass is a 100% endlessly recyclable material, and is commonly reused in the manufacture of new glass bottles and jars, as well as fiberglass insulation applications.

Glass Container Recycling Industry Highlights

Americans have expressed a clear desire to recycle glass. A national 2016

survey conducted by SurveyUSA showed:

- 95% who live in a community which recycles glass say glass should continue to be collected by recyclers.
- 91% say that recycling is an important part of conserving natural resources.
- 90% say that it is important to recycle materials rather than sending them for landfill disposal.

A 2017 survey commissioned by the Glass Recycling Coalition found a similar desire expressed by respondents, recognizing the value of recycling glass, and a desire for continued access to glass recycling in their communities.

A 2016 Sustainable Packaging Coalition study found that 81% of the U.S. population had access to recycling programs that accepted glass beverage bottles. GPI would like to increase recycling access for glass bottles and jars to all Americans.

Using recycled glass provides longstanding and well-defined energy and associated GHG emissions benefits, which has been recognized by the California Air Resources Board, EPA, Dept. of Energy and the U.S. Congress, just to name a few.

Comments on Report Recommendations

The recommendations cite a glass recycling rate of 36.7% for the state, based on Maryland's 2016 Statewide Waste Characterization Study (pp. 11-12.) Recommended for glass is a "material specific" recycling goal of 55% by 2035 (p. 11).

While we support the increased recycling goal for glass, how rates for glass, and other materials, are of paramount importance. Counties and cities in Maryland continue to report recycling data based on weight, a critical metric, as all recyclables collected, processed and sold to end markets are done so by the ton.

Page 4 of the recommendations states; *"Glass recycling and source reduction benefits relate more to energy savings rather than GHG reductions (though there are GHG benefits, also). Glass can also be recycled with no loss in quality (unlike paper). Additionally, for every ton of glass recycled, 1,300 pounds of sand, 410 pounds of soda ash, 380 pounds of limestone, and 160 pounds of feldspar are saved."*

We appreciate this recognition, and would like to add that associated greenhouse gas emissions are reduced anywhere from 4-6%, for every 10 percent of recycled glass added to the raw materials batch.

To this point, environmental and energy benefits vary between the materials currently tracked by Maryland. GPI cautions against future policies and preferences that pick winners and losers among them, based on these savings.

The greater the environmental benefit designated for a particular product, the greater the energy used to produce that same product in the first place. Many of the life cycle analyses conducted for products are now several years old, and may not capture current data surrounding lightweighting, transportation-based emissions, raw materials sourcing and extraction.

GPI encourages the Department to continue reporting out recycling and recovery for glass and other materials by weight. We acknowledge that data on energy savings and environmental benefits are also important metrics, however they should be used to complement, not replace, tonnage related recovery information, to provide a more complete picture for residents and stakeholders.

End of Life Scenarios

While the recommendations place a large focus on reduced energy use for packaging and other materials handled, they do not address “end of life” (EoL) scenarios.

EoL scenarios are critical to understand, if Maryland is to truly address recycling/recovery in a comprehensive manner, as proposed under the Sustainable Materials Management recommendations.

While EoL scenarios for packaging, commodities and other products may be challenging to factor concretely into SMM structures, the impact products have on the broader environment, including oceans, rivers, streams and other waterways, must be considered.

EPA’s 2017-2022 Sustainable Materials Management (SMM) Plan

As the country’s regulatory agency for recycling and solid waste related regulations, and a national leader in both areas, we want to highlight key

packaging goals, which were included in EPA's 2017-2022 SMM Plan.

While the EPA has spent several years investigating the role of reduced energy and greenhouse gas emissions benefits, as well as lifecycles of evolving packaging, their current recycling metrics remain weight based.

Page 4 of the EPA's 2017-2022 SMM plan highlights the need to increase the quantity, yield rates and quality of recyclables collected and processed by recycling industries.

GPI and its members agree with these goals, as they are measurable, understood by municipalities, and help drive recyclable materials back to manufacturing industries. We encourage the Department to review EPA's 2017-2022 priorities and goals.

Thank you for your consideration of our comments.

Sincerely,

Joe

Joseph J. Cattaneo
Executive Director
Glass Packaging Institute (GPI)