



August 4, 2017

CalRecycle
Department of Resources Recycling and Recovery
1001 I Street
Sacramento, CA 95812

On behalf of the Glass Packaging Institute (GPI), I am pleased to provide the following comments to the July 20th issued *Draft Screening Criteria for Determining Priority Packaging Types*. Our comments generally follow the criteria list contained in the draft screening document.

While packaging represents part of California's landfill waste stream, GPI and its members strongly encourage CalRecycle to examine all elements (organics, C&D, among them) of landfill disposal as they develop strategies to reach the state's 75% recycling goal.

Background:

California is home to four glass container manufacturing plants, six glass "processing" (recycling) facilities and over 2,500 industry employees. Recycled glass is a critical manufacturing input for the California glass container manufacturing industry, and recovering bottles and jars is a top priority.

Glass is a 100% and endlessly recyclable packaging material. When glass container plants utilize recycled glass as part of the overall batch mix, furnace temperatures are reduced, resulting in lessened energy use and lower greenhouse gas emissions, assisting industry in complying with local and state air quality regulations.

California's Bottle Bill Provides Significant Recycled Glass to Industry

California is already a top state in terms of recycling, aided by a successful bottle bill recycling program. For the second half of 2016, [over 66% of glass containers were recycled into new products](#), with 77% of glass containers in the bottle bill program redeemed. Through participation in recycling programs, consumers understand the value and importance of recycling glass bottles and jars.

Minimal Presence in California Landfills:

The impact of glass food and beverage containers in California landfills is minimal. Glass food and beverage bottles and jars of all colors and sizes represent only 1.5% of the total disposal tonnage in California landfills, according to the most recent [California Waste Characterization Study](#) (page 33). Landfill disposal is small, due in large part to strong in-state recycling programs.

Strong Collection and Infrastructure

Glass containers are routinely collected recyclables in roughly 80% of the country's recycling programs. As an "original" recyclable, solid waste managers and the residents they serve understand that glass can be recycled, and that strong end markets exist. GPI and its member companies regularly communicate the importance of keeping glass in traditional recycling programs with haulers, MRFs, solid waste and recycling officials, as well as our customer groups.

A July 2016 [comprehensive survey conducted](#) by the Sustainable Packaging Coalition of nearly 2,000 community recycling programs, placed access to glass beverage container recycling at 81% nationwide. This is 20 percentage points above the 60% Federal Trade Commission threshold for general recyclability claims and labeling, issued through the agency's Green Guides.

Over [50 in-state MRFs accept glass containers](#) as part of their incoming recyclables stream. Many of the MRFs and recycling processors have installed additional screens, blowers and other equipment to more effectively recover the glass through the sorting line.

Data Collection Improvement

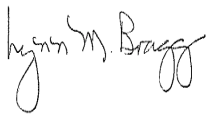
GPI and its members have long supported continual improvement of recycling-related data collection. Better understanding where recycled glass and other materials end up after being collected provides insight on recycling program performance. Clear recycling program metrics may also assist and aid ongoing efforts to reduce contamination rates among all packaging material types.

Recycled Glass Provides Significant Greenhouse Gas Benefits

According to the EPA WARM model, for every 1 ton of recycled glass used to make new bottles, energy (and associated greenhouse gas emissions) are reduced by one-third. This is beneficial to the environment, and to the glass container companies operating in-state. In addition to recycled glass, sand, soda ash and limestone (the other ingredients used to make a new glass bottle or jar) are found domestically, helping to close the loop on production.

Thank you for your thoughtful consideration of our comments.

Sincerely,



Lynn M. Bragg
President