



February 19, 2019

The Honorable Reuven Carlyle
Chairman
Senate Environment, Energy & Technology Committee
J.A. Cherberg Building
Senate Hearing Rm 1
Olympia, WA 98504

Re: In Opposition to Senate Bill 5854

Dear Chairman Carlyle:

On behalf of the Glass Packaging Institute (GPI) and our members with glass container manufacturing and glass recycling operations in Washington State and across the country, **I offer our strong opposition to Senate Bill 5854.** The glass container manufacturing industry operates two plants in-state, (Seattle and Kalama), and a glass processing (recycling) facility in Seattle, collectively employing over 600 constituents.

As outlined below, Senate Bill 5854 is overly prescriptive, damaging to glass recycling and limits key decisions now made by local recycling program officials. It would sow confusion among constituents and establish a poor precedent for other states to follow.

Section 3

Section 3 of the legislation would exclude glass from being part of any city or county's commingled (aka "single stream") program beginning January 1, 2020. **Prohibiting glass recycling from single stream programs would have a devastating impact on the state's ability to recycle glass and manufacturers who use that glass for feedstock.**

Glass bottles and jars are 100 percent and endlessly recyclable. When glass container plants increase the amount of recycled glass added to the raw materials used to make glass (sand, soda ash and limestone), furnace temperatures can be reduced, resulting in less energy use and lower greenhouse gas emissions.

Recycled glass is currently recovered from single stream programs, and is a critical manufacturing input for our industry, recognized by Governor Inslee, state legislatures in California and Oregon, as Energy-Intensive-Trade-Exposed

(EITE). Limiting access and availability to recycled glass would place additional stress on these operations.

Section 4

Section 4 of the legislation requires cities and counties to conduct or consider a life cycle analysis of materials to be included in future single stream programs. Such analysis would need to demonstrate environmental and cost benefits, with those metrics developed by a narrowly defined working group (see Section 5).

GPI, along with other industries, has conducted a life cycle analysis, which demonstrated a clear and decisive environmental benefit for recycled glass. Any cost benefit analysis would be subjective in nature, as prices paid for glass, and all other recyclables, fluctuate depending on quality and end market demand, cost for recycling services provided, and other contractual obligations made between local governments and private companies. Simply put, legislating a cost benefit analysis to determine viability of a specific recyclable would be imprudent.

Section 5

Section 5 of the legislation would create a working group, tasked with developing recommendations to the legislature on a process to include recyclable materials in the future, and to educate constituents on recycling contamination and related issues.

While representatives from the materials recovery facility (MRF) and hauling industries are eligible to participate in the working group, proposed membership does not include recyclable processing companies (those companies purchasing recyclables from the MRFs), or the manufacturing end markets (the ultimate buyers of recyclable materials). Without full representation of the recycling supply chain, any working group recommendations would be incomplete and limited in scope.

Section 12

Section 12 of the legislation eliminates the state's 50 percent weight-based recycling goal. While organizations and governments are reviewing options for sustainable materials management and subsequent measurement, state and U.S. EPA recycling data remains issued on weight-based metrics.

While GPI does not object to incorporating sustainable metrics, reducing contamination for all recyclables and reviewing a comprehensive approach, we oppose the immediate proposed shift away from Washington's long established recycling goals, without clear metrics in place developed by all stakeholders.

A Similar Approach Has Already Been Rejected

For comparison, after a comprehensive stakeholder process held last year, Oregon's Department of Environmental Quality (DEQ) declined to endorse a similar, "prohibited recyclable materials list" for commingled collection.

As acknowledged by Oregon's DEQ staff during meetings, what is included in recycling programs should remain at the discretion of the cities, towns and municipalities that contract with hauling and recycling companies. **Senate Bill 5854 would go one step further, by dictating to local government recycling officials exactly what can and cannot be in their single stream recycling programs.**

While we recognize the financial pressures being exerted on the recycling stakeholder chain, due in part to China's contamination restrictions on imports, the ability for constituents to recycle glass should not be restricted. Glass has a strong manufacturing base in domestic marketplaces, with end markets in Washington, and throughout the west coast. Glass has never been part of the recyclable commodities export market to China or elsewhere. Singling out specific materials for restrictions in this manner restricts trade, and is counterproductive to good recycling policy.

By weight, glass containers on average comprise 25% of a curbside recycling program's volume. A 2017 survey conducted by the [Glass Recycling Coalition](#) **found that 96% of residents expect to be able to recycle their glass bottles and jars.**

Senate Bill 5854's most restrictive provisions would greatly reduce the opportunity for your constituents to recycle glass. Legislators should consider their constituents' desire and expectations regarding glass recycling when contemplating legislation and developing recycling regulations.

Thank you for your thoughtful consideration of our comments.

Sincerely,

Joe

Joseph J. Cattaneo
Executive Director

Cc: Members: Environment, Energy & Technology Committee