March 18, 2019

To: The Honorable Nicole Lowen, Chair
Members, House Committee on Energy and Environmental Protection

From: Tim Shestek
Senior Director, State Affairs

RE: HR 176 – Comments

The American Chemistry Council (ACC) is writing to offer the following comments on HR 176, which seeks to convene a working group to discuss local issues surrounding waste reduction. ACC and its members certainly support efforts to reduce waste; however, we think this resolution should take a material neutral approach and focus on the recycling and recovery of all waste, not just single-use plastics.

We would request this resolution be revised with the below suggested language to include all materials and technologies in the discussion of waste reduction. Focusing on one material type or solution will not lead to meaningful reductions in overall waste, but merely shift the composition of waste to alternative materials.

(1) Potential <u>efforts to increase waste reduction and recycling programs;</u> ~~source reduction techniques, including plans to eliminate single-use plastic packaging from the Hawaii waste stream and phasing out the use of single-use plastic beverage containers;~~

Attention is rightly turning to the overall volume of consumer waste generated by the way in which we use products, and many are looking for ways to reduce or eliminate wasteful uses of products. Any discussions on this issues should be informed by scientific data, reflect input and expertise from the packaging industry, food service providers, and others and ensure meaningful recovery of all packaging materials.

Plastics are often used because the material can do more with less. Plastics help reduce greenhouse gas emissions, require less energy and water to produce, require less fuel to transport, and help significantly reduce food waste.[1] All packaging leaves an environmental footprint regardless of the material type. It takes energy and raw materials to produce, transport, and recover or dispose of any material. So it is important to measure all of these impacts throughout the entire lifecycle of a product.

Some key questions the Legislature should direct the working group to consider in their development of recommendations include:

- Will the recommendations and any accompanying proposed legislation actually reduce waste or rather simply result in replacing one type of trash with another?
- Are there environmental impacts (e.g. energy use, water use, impacts on greenhouse gas emissions, trash generation, landfill waste, etc.) associated with the manufacture, distribution, use and disposal of likely alternative replacement products?
- Are likely replacement products recycled or composted within the State's existing infrastructure and do viable, end use markets exist for these products?

[1] https://www.plasticpackagingfacts.org/plastic-sustainability/sustainable-packaging-design/

Making significant progress towards reducing waste will require the implementation of a variety of tools. In addition to efforts that seek to increase recycling and improve solid waste collection infrastructure, opportunities to recover non-recycled plastics may be an option as well. An emerging set of technologies is allowing governments and businesses to convert non-recycled plastics into energy, fuels, and feedstocks, or raw materials for new manufacturing. A range of energy recovery technologies are being used to complement recycling in helping to divert more valuable post-use materials from landfills.

Thank you in advance for considering our views. If you have any questions please do not hesitate to contact me at 916-448-2581 or via email at Tim_Shestek@americanchemistry.com. You may also contact ACC's Hawaii based representative Ross Yamasaki at 808-531-4551.