



The Honorable Andrew Wheeler
Administrator
U.S. Environmental Protection Agency (EPA)
1200 Pennsylvania Ave, N.W..
Washington, DC 20460

Docket No. EPA-HQ-OLEM-2020-0462
Notice of Proposed Rulemaking published Oct. 5, 2020

December 4, 2020

To Administrator Wheeler:

The Sustainable Food Policy Alliance (SFPA), whose founding members Danone North America, Mars, Incorporated, Nestlé USA and Unilever United States represent some of the world's best-known food companies, write regarding the Environmental Protection Agency's, "Draft National Recycling Strategy," (Docket No. EPA-HQ-OLEM-2020-0462) released on October 5, 2020.

As part of our work on climate and the environment, SFPA and SFPA member companies have increasingly focused on addressing packaging and recycling issues, especially the global plastic challenge and marine debris. This work is essential to reducing our carbon footprint and supporting a healthier planet. Individually, member companies have invested in making consumer product packaging more sustainable with a focus on reducing the use of plastics in our packaging, adopting recyclable materials, and investing in recycling and waste collection infrastructure as well as end markets for valuable recyclable materials. Across the board, SFPA member companies have set ambitious goals to integrate post-consumer recycled content (PCR) into our packaging.

However, similar to larger climate issues, we recognize that there is only so much progress that we can make as individual companies, and the reality is that our goals cannot be met without significant shifts in our nation's waste management and recycling systems. That is why we are working together and in broader coalitions to advance policies that are beneficial for the environment, while accounting for the specific business imperatives of our supply chains.

We have been working alongside a variety of stakeholders – including other companies, recycling operators, as well as federal and local government – as they come together to make end-to-end system changes that will truly transform our waste management system into a circular economy. We are pleased that EPA has undertaken this effort to improve the U.S. recycling system. In particular, we support EPA's first ever National Recycling Goal of reaching a 50 percent recycling rate by 2030. This goal will ultimately move more material into the system, which is a key step to improving the U.S. recycling system overall.

We believe that expansive action by EPA will allow for the necessary innovation to reach the National Recycling Goal and others in the coming years. As we have seen with our partners and

at our own companies, innovation in this space has been moving rapidly. It is our hope that the National Recycling Strategy can accommodate that innovation and amplify it over time.

One area that may benefit from flexibility is the working definition of the term recycling. In the Draft National Recycling Strategy, recycling is defined as, “mechanical recycling, which is the series of activities by which discarded or used materials are collected, sorted based on physical/mechanical characteristics, processed and/or converted into feedstock and used in the manufacture of new products.” However, ultimately, it will take many recycling technologies, including chemical recycling in addition to mechanical recycling, to make the systemic changes that are needed to address the recycling challenges in the U.S. An expansive view of recycling is alluded to in other sections, namely those regarding product and packaging design as well as sortation. Directly stating that recycling encompasses multiple technologies will help drive the necessary technology evolution in this space to execute the National Recycling Strategy and achieve its long-term goals.

EPA’s objectives are largely in line with the goals we have as an Alliance. In July 2020, SFPA released a set of packaging and recycling policy priorities. These priorities envision a future where more recyclable material is moved into a recycling system that has reduced contamination rates, increased processing efficiency and improved markets for recycled materials.

We offer our packaging and recycling priorities here as a guide to our thinking, strategy and approach for moving forward as an Alliance and individual companies. We bring this perspective to all of our stakeholder work on these topics and hope that it may be useful as EPA finalizes its National Recycling Roadmap in 2021. The Alliance believes that a successful recycling system will take these three tenets into account:

1. *Improve Access to Recycling:* Adopt policy measures to improve effectiveness of recycling systems to achieve increased recycling rates, decreased landfilling, and recycling price parity with disposal. Areas of focus for state and local governments should include: disposal surcharges, accurate product and bin labeling, infrastructure investments, resources and support for community collection, and expanded recycling education.
2. *Transform waste management to a circular system.* Ensure a nationally consistent, economy-wide approach to packaging life cycle management by establishing a public-private partnership that can make recycling infrastructure improvements to drive the transition to a circular economy. Funds would be derived from eco-modulated fees collected from brand owners and distributed toward recycling system improvements based on a quantitative analysis of community needs.
3. *Establish Consistent Standards and Enhance Measurement:* Federal and local governments can lead the way to prioritize recycling, increase collection, and decrease contamination by setting more consistent standards for accepted materials across

regions and collecting, analyzing, and reporting data on U.S. recycling operations. Together, these actions will improve sortation and capture across the board, provide important data to target investments, and accelerate the move towards a more circular economy for paper and packaging materials.

We recognize our responsibility to drive positive change for the people who use our products, the people who supply them, and the planet on which we all rely. We stand ready to serve as a resource to EPA as the Agency executes its National Recycling Strategy and finalizes its National Recycling Roadmap in pursuit of reaching the nation's first ever National Recycling Goal.

Sincerely,



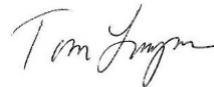
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