



November 8, 2021

Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Potential Future Regulation Addressing Pyrolysis and Gasification Units [Docket Number: EPA-HQ-OAR-2021-0382]

Dear Ms. Fischer,

The Sustainable Food Policy Alliance (SFPA), which includes global food companies Danone North America, Mars, Incorporated, Nestlé USA, and Unilever United States, is working to accelerate the pace of change in the food industry through individual company leadership and collaboration on policy solutions to issues facing our supply chain, employees, and customers. In recent years, our work together has also included a collective approach to packaging and recycling issues.

SFPA member companies have invested in making consumer product packaging more sustainable with a focus on recyclability and the circular economy. Individually and collectively, Danone North America, Mars, Incorporated, Nestlé USA, and Unilever United States are investing in improving recycling systems around the world, innovating our packaging design, and collaborating with suppliers, local communities, and retail customers to advance forward-looking solutions that help our consumers make a difference and impact the planet. In addition, across the board, SFPA member companies are committed to reducing unnecessary plastic packaging, testing reuse options, and reaching ambitious goals to integrate post-consumer recycled content (PCR) into our packaging. This is particularly challenging in the food packaging space where all packaging must meet the highest standards of safety set by the Food and Drug Administration. To date, there are very few FDA-approved material types and sources for food packaging with recycled content.

Therefore, we are deploying a multifaceted approach to achieve these goals by working with stakeholders across the value chain to drive transformational change to our nation's current waste management and recycling systems that will result in more material being collected and more usable, recycled content coming out.

This involves increasing our nation's collection system, improving recycling infrastructure, and investing research and development into new technologies that will increase the types of materials that can be simply, safely, and economically recycled. In the food packaging space, this means that over the long term, advanced recycling technologies which involve depolymerization – a process by which materials are melted down to be purified and reformed – will need to be deployed for certain types of food packaging.

As part of our support of advanced recycling technologies, SFPA supports air quality, siting and permitting processes that protect disadvantaged populations and mitigate environmental impacts. That is why we are commenting as part of this docket regarding "Potential Future Regulation Addressing

Pyrolysis and Gasification Units” as a strong regulatory structure will help ensure that the growth of our nation’s recycling infrastructure protects the people and places around it.

Specifically:

- In order to achieve a circular economy, SFPA recognizes that advanced recycling converting recycled plastics to resins – like pyrolysis – are key. We do not support widespread deployment of plastic to fuel technologies like gasification.
- SFPA supports pyrolysis for certain plastic recycling, which is essential to developing a fully circular recycling system, and will help to recover materials that are currently more challenging to recycle through mechanical processes like polypropylene (PP) and polyethylene (PE) in flexible formats. Flexible PP and PE play an important role in ensuring our products meet the highest quality and food safety standards while also minimizing food waste.
- Including strong air quality regulation for pyrolysis facilities, like any other manufacturing operations, will ensure the aim of specifically protecting disadvantaged populations and mitigating environmental impacts
- In addition to implementing strong air quality regulations for these facilities, SFPA also supports thorough siting and permitting process for new and existing facilities – including opportunities for public comment – to ensure a comprehensive approach that takes environmental justice into account.

SFPA looks forward to continuing its advocacy for transformational change in the United States waste and recycling system, furthering our transition to a circular economy, and innovating in our packaging materials. A strong regulatory structure to protect disadvantaged communities and the environment is essential as we deploy new technologies that will strengthen our recycling system, reduce waste and protect food safety. Our waste crisis requires both collaboration and innovation, and we are eager to work with you to develop forward-thinking solutions.

Thank you for your attention to this matter, and please do not hesitate to reach out with any questions.

Sincerely,

Sustainable Food Policy Alliance

