



July 25, 2022

Administrator Michael Regan
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Request for Information: Recycling Education and Outreach; Grant Program and Model Recycling Program Toolkit [Docket Number: EPA-HQ-OLEM-2022-0375]

Dear Mr. Regan:

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 applauds the EPA's Request for Information on recycling education and outreach. This is a critical area to address as we seek to collectively improve the effectiveness of residential and community recycling programs. This is a topic that SFPA has supported in our shared advocacy to-date and is showcased in our [Packaging and Recycling Policy Priorities](#), which aim to shift away from the status quo and toward a waste and recycling future where companies like ours can set and meet ambitious goals to integrate post-consumer recycled content (PCR) into our packaging, consumers are educated to better navigate their local recycling systems, and we can all be better stewards of the environment.

We are eager to assist EPA and the Office of Resource Conservation and Recovery (ORCR) in this effort and wanted to flag the following specific areas of feedback based on the RFI:

Standardized Terminology: What are some of the standardized terms and examples that may be used to describe materials that are accepted by a residential recycling program?

We have found that consumers are responsive to on-package instructions regarding recycling (i.e., How2Recycle labels that are prevalent on product packaging). However, local variation in recycling systems and inconsistent labeling on packaging can cause confusion. SFPA companies are actively reaching out to consumers through updated packaging labels and social and traditional media engagement. We support policies that prioritize community education and clear, consistent labeling.

As outlined in the RFI, we support conducting best practices research and implementing a standard labeling system for on-package, community, and public space recycling



information that allows for local variation while also improve recycling rates, particularly when layered onto more consistent standard-setting for accepted materials across regions.

***Other Feedback:* What suggestions should EPA consider while developing the Recycling Education and Outreach grant program and Model Recycling Program Toolkit? Based on the legislative language, are there projects that you believe would be eligible in the Education and Outreach grant program, but have not been mentioned?**

We support grants for consumer education initiatives as well as increasing availability of no- or low-cost resources, like the Model Recycling Program Toolkit, for communities that can help municipalities clearly articulate the guidelines for their local recycling infrastructure and may be distributed to school districts, non-profits, and local government, among others.

At this stage, it is critical that EPA fulfill the Congressional intent of the Infrastructure Investment and Jobs Act and prioritize programming that focuses on education and outreach to consumers and communities on waste prevention, recycling, and composting. This narrow focus will fundamentally reduce the generation of waste, improve effective recycling, and reduce contamination in the recycling stream.

Thank you again for the opportunity to comment on this RFI. 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 continues to work on these critical issues.

Sincerely,

