



July 25, 2022

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

**Re: Request for Information: Solid Waste Infrastructure for Recycling Program [Docket Number: EPA-HQ-OLEM-2022-0342-0001]**

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 regarding the Solid Waste Infrastructure for Recycling (SWIFR) Program as it provides a critical opportunity for the Federal government to make improvements to local post-consumer materials management including municipal recycling programs, which are critical to meeting our shared goals of minimizing waste and creating a more circular economy. Congress sent an unmistakable message on how important expanding and upgrading our recycling infrastructure is when it created this program in the Save Our Seas 2.0 Act and funded it via the Bipartisan Infrastructure bill, also known as the Infrastructure Investment and Jobs Act.

SFPA member companies have invested in making consumer product packaging more sustainable with a focus on recyclability and the circular economy. Individually and collectively, we 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, 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.

We know that our work is more effective when undertaken together. As part of our advocacy, we have outlined policy priorities that 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. Our main priorities are as follows:

1. *Improving Access to Recycling:* Adopt policy measures to improve effectiveness of recycling systems to achieve increased recycling rates, decreased landfilling, and price parity of recycling and 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. *Transforming waste management to a circular system.* Ensure a nationally consistent, economy-wide approach to packaging life cycle management by establishing a national extended producer responsibility (EPR) program, which functions as 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. *Establishing Consistent Standards and Enhancing 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 are providing comments relating to the following questions:

**What are the barriers and challenges facing states, territories, tribes, local governments and communities with regard to post-consumer materials management and how can SWIFR grants assist in overcoming those barriers?**

SWIFR grants aim to increase recycling which will in turn reduce climate, environmental, and social impacts of materials use and keep valuable resources in use instead of in landfills. EPA-led public private partnership investment in recycling infrastructure will help amplify and scale activities across solid waste management systems around the country, creating meaningful change.

These aims are also in line with SFPA's packaging and recycling principles such as:

- Improving access to recycling by adopting policy measures to improve effectiveness of recycling systems, such as accurate product and bin labeling, infrastructure investments, resources and support for community collection, and expanded recycling education.
- Establishing consistent standards and enhancing measurement to help prioritize recycling, increase collection, and decrease contamination. Collecting, analyzing, and reporting data on U.S. recycling operations will provide important data regarding target investments.

**Are there specific recommendations that EPA should be considering to improve post-consumer materials management, such as:**

- **Examples of equipment and tangible infrastructure, technology, or other improvements needed to increase access and/or increase recovery of materials;**
- **Programs or projects that will support local, state or regional markets for material;**
- **State and local data needs to improve measurement of materials and how they are managed.**

We believe there is an opportunity to jumpstart the transition to a circular economy through the SWIFR grants. These grants will catalyze critical upgrades, support local government programs, create jobs and drive economic growth, all while delivering positive environmental outcomes.

We recognize that infrastructure and education investments are a key part of upgrading our nation’s recycling capabilities and changing behavior to get more quality recyclables into the recycling stream. Some examples of the types of investment we envision being made under this approach include:

- Funding for technology and facility upgrades at Materials Recovery Facilities (MRFs) to ensure these facilities can sort a variety of materials and formats – increasing the amount and types of material that re-enter the market and creating value in the recycling stream.
- Funding for public-private grants to upgrade collection infrastructure – like recycling carts and improved/efficient vehicles for hauling and/or rural and multi-family recycling solutions – to boost recycling rates.
- Funding for improved consumer education in recycling programs regarding “recycle right” behavior in municipalities across the country to increase collection rates and the quality of materials collected.

**Examples of projects, studies, or initiatives, and associated estimated costs, to implement innovative approaches to improve post-consumer materials management:**

SFPA member companies have deployed a multifaceted approach to develop the supply of and to integrate more post-consumer recycled content into packaging. We are collaborating with stakeholders across the value chain to drive transformational change to our nation’s current waste management and recycling systems in order to drive more material collection and more high quality, usable recycled content. This involves increasing access to collection, 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.

Materials that can be safely recycled are of paramount importance in food packaging. Over the long term we will need a suite of technologies that include advanced recycling technologies as a complement to mechanical recycling to generate food-safe PCR, which in turn allows companies to reduce their virgin plastic usage.

Specifically:

- To achieve a circular economy, SFPA recognizes that advanced recycling that converts recycled plastics to resins is key. We do not consider plastic-to-fuel or energy technologies recycling.
- Advanced recycling 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.
- We support strong air quality regulation for advanced recycling facilities, like any other manufacturing operation, ensuring protection for disadvantaged populations and mitigating environmental impacts. In addition, SFPA also supports a 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.

We sincerely thank you for EPA’s comprehensive efforts to address post-consumer materials management. Our waste crisis requires both collaboration and innovation, and we are eager to work with you to develop forward-thinking solutions.

Sincerely,

