American Chemistry Council℠

For the Record

July 26, 2011

Hon. Christine Quinn
Speaker, NYC Council
New York, NY

AMERICAN CHEMISTRY COUNCIL URGES SUPPORT FOR PROPOSED INT. 461-A –PACKAGING REDUCTION

Dear Speaker Quinn:

The American Chemistry Council (ACC) is a national trade association representing the plastics industry in New York and around the country. ACC strongly supports packaging policies that are based on or utilize life-cycle thinking, and that lead to environmental benefits such as reduced GHG emissions and energy and waste reduction. We congratulate New York on its efforts to reduce, reuse, and recycle packaging.

ACC supports Int. 461-A, and asks that you support this legislation. This important legislation, which seeks to reduce excess packaging, also takes into consideration the importance of packaging in protecting a product and preventing waste. Implemented properly, this will help introduce more resource- efficient packaging and will complement NYC's decision to expand its recycling infrastructure to include rigid plastic packaging in 2010 and its successful retailer plastic bag take-back program in 2008.

Across the globe, leading packaging experts use Life Cycle Inventory studies when considering source reduction, reuse, and recycling. Life Cycle Inventory studies on various packaging materials indicate that significant reductions in energy consumption, solid waste generation, and greenhouse gas emissions can be achieved by moving to lighter weight packaging.

The environmental benefits of light-weighting packaging and source reduction are amply illustrated in recent research sponsored by ACC through Franklin Associates, a respected life cycle assessment firm. Franklin reviewed the impacts of packaging used for tuna, coffee, and milk containers.[1] The studies took a cradle-to-grave approach, scrutinizing the steps from raw material extraction through disposal and/or recycling. Following completion of the work, the studies were peer reviewed by independent experts. These studies found that the use of plastics can significantly reduce the environmental impacts of the packaging. For example, plastic coffee packaging consumes 60 percent less energy and produces 75 percent less solid waste and greenhouse gas emissions than does a metal can.

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[1] Plastic Packaging Life Cycle Inventory (LCI) Studies for Coffee, Tuna and Milk Containers (Franklin Associated 2008) for summaries see http://www.use-less-stuff.com/2009-research/Coffee-LCI-Study-Summary.pdf
http://www.use-less-stuff.com/2009-research/Tuna-LCI-Study-Summary.pdf
http://www.use-less-stuff.com/2009-research/Addendum-to-Milk-Container-LCI.pdf

Despite these successes, our industry recognizes that more can be done – and we're on the leading edge of working to develop more breakthrough packaging innovations. Here's just one example: in 2009, *Packaging Digest* reported that the new Peter Pan ® jars use about 12 percent less plastic than the previous design, eliminating enough plastic to fill more than 24 garbage trucks each year. *Packaging Work,* a packaging magazine, reported the "Eco-fina" Pepsi® water bottle uses 50 percent less material and reduces the pounds of plastic used to bottle this product annually by 75 million pounds. Also, in an effort to reduce material consumption, companies are switching from alternative materials to plastic because they use less material and are light weight. In 2008, Kraft ® switched its classic Miracle Whip ® jar from glass to plastic. This simple step had immediate and dramatic results -- Kraft ® decreased its fuel consumption by 87,000 gallons annually. Lighter plastic packaging means lighter loads and fewer trucks and railcars needed to ship the same amount of product. The Global Packaging Project, EPA's WARM model, and Wal-Mart's packaging tool all look at the value of light-weighting and source reduction when considering material selection for packaging. Another key area of waste reduction is in the area of packaging efficiency as it relates to waste prevention. A 2007 study provides clear and compelling examples of the value of source reduction as a strategy for developing and evaluating sustainable packaging[2]. The study provides numerous examples of the key characteristics of product/packaging configurations that add to their overall level of efficiency and sustainability. In many cases, flexible packaging is a way to reduce packaging through source reduction (before recycling/composting or landfill) and has greater waste reduction benefits than recycling alone. As an example, in the case of cereal, based on an equivalent amount of 1000 lbs of cereal – a flexible 15 oz. foil/LDPE bag with a zero percent recycling rate generates 28.4 pounds of discards; while a 12.5 oz. rigid fiberboard box with a 35 percent recycling rate generates 222.6 pounds of net discards. While recycling plays a prominent role in reducing discards, source reductions plays an even greater role in minimizing wastes – in cities like New York and throughout the U.S.

Reducing, reusing, recycling, and ongoing innovations in packaging is important to plastic manufacturers and important to the public. We support development of guidelines that will help prioritize practical, science-based solutions to increase the reuse, recyclability and recycling of packaging while maintaining product protection.

We encourage support for Int. 461-A. We look forward to continuing to work with New York City on sustainable packaging solutions in the future.

Sincerely,

Stephen Rosario, CAE
Senior Director, Northeast Region
American Chemistry Council

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[2] A Study of Packaging Efficiency As It Relates to Waste Prevention, Prepared by the Editors of the ULS Report, February 2007