



11/6/17

To Whom It May Concern:

We appreciate the opportunity to comment on our concerns related to proceeding with the collection of the Hefty Energy Bag Program, K-Cups and Food Packaging at MRFs. While we are excited by opportunities to increase recycling, we believe that given the current importance of material quality and potential issues of contamination these materials bring, the lack of clarity on market acceptance and demand for these items, relatively small diversion potentials and the potential to confuse residents through conflicting educational messages, now is not the time to add these materials at MRFs. We ask ISRI not to add these items as acceptable in any stream.

The undersigned Material Recovery Facilities (MRF) represent over 115 years of operation and 194,000 tons of material processed annually. We represent best in class facilities dedicated to providing cost effective services while providing the highest environmental and social benefits from recycling. Our programs have become trusted institutions through a long history of resident engagement and transparency, demonstrated by long standing relationships with our communities, municipal partners, and hauling partners

Throughout our histories, we have worked to make recycling more convenient, cost effective and accessible in an effort to increase the diversion of materials from the waste stream. Innovative efforts have included adding materials collected, providing extensive education to residents, engaging multi-family, commercial and public spaces, and changing collection methods and container types. This work has always been for the purpose of providing additional environmental and social benefits to the communities we serve and as we look to new materials we think it is vitally important to continue looking at the opportunities through this lens.

We urge the committee to consider the following concerns and barriers to adding these products to a MRF.

**Contamination:** As companies who have all weathered massive commodity value fluctuations over the years, nothing has been more important to the sustainability of recycling than consistent quality. Quality gives us the flexibility to send material to multiple markets, make our material movement better as quality material is in more demand when markets are tight, and allows us to use the material for their highest and best use. Now, in the context of National Sword, focus on quality is at an all time high once again. Previous contamination is becoming prohibitive and additional contamination may result in reduced prices, difficulty in moving loads, and rejection of shipments. There are several concerns the products present to material quality:

- How will these new products run through MRFs? Will the products end up in the correct bales going to the correct markets or will they end up in the wrong bales contaminating other streams? Size of products is an issue as many MRFs have 2" screens that the products could fall through.
- How much food waste will there be in the products? While several proposals include education design, how well tested are these education campaign designs in terms of effectiveness in ensuring that food waste won't cause additional contamination for our end markets? Will K-Cups be emptied of coffee grounds and how will grounds impact the

capture rates quoted by Keurig? How effective will education campaigns regarding aggregating K-cups be, particularly in regard to the flow of K-cups placed in recycling carts not in an aggregated manner? The same concern is true for all food packaging and the potential for food contaminated paper to contaminate the paper stream.

- For the Hefty Energy Bag Program, what will be the impact from bags that break open, aren't properly closed, or from residents that place the items advertised in their single stream bins without a bag. Experience from other bag programs tell us this is a very likely, and unsolved problem. This would also require additional preprocessing at the front of the line and interfere with other bag breaking systems already installed.
- Are there consistent, economically viable and widely accepted end markets for the materials collected both domestically and internationally? We especially have concerns around additional plastics.

**Economic Cost Impacts:** MRF efficiencies and material quality allow us to provide cost effective programs to communities, ensuring that they are sustainable. We need to have a better understanding of how these materials will impact MRF throughput rates and what investments will be required to ensure the materials are properly sorted. In addition, plastic bags already cost us significant time as they get tangled on screens, shut our lines down and cross contaminate other material resulting in additional quality control costs. We do not want to see additional plastic bags coming through our facility. Finally, contamination can impact the value of the commodities resulting in a loss of revenue.

**Education Impacts:** Significant investments in education have resulted in high community participation and low residual rates at our facilities. What is the education plan for these additional materials and have they been tested thoroughly before roll out? Once a material is added, it is extremely difficult to stop the collection. A clear understanding of the ability to effectively educate all residents to prevent contamination and comply with any special instructions (such as putting it in a special bag) is critical.

**Community Trust:** Residents participate in recycling because they believe the item is being recycled and used in a new product. This trust is vitally important to maintain a high quality and high participating program. All efforts must be put into not creating confusion for residents. The Hefty Energy Bag program especially challenges the need for community trust. Already, 167 people and 59 organizes have signed a pledge organized by GAIA stating that burning plastics is not recycling and looking for better solutions than burning of plastics.

For the reasons described above, we believe that now is not the time to add these materials to a MRF and doing so will threaten the sustainability and long term success of our programs. Please feel free to reach out to us for further discussion.

Kate Davenport  
Lynn Hoffman  
Co-Presidents  
Eureka Recycling

Martin Bourque  
Executive Director  
Ecology Center

Richard Valle  
President  
Tri-CED Community Recycling

Bryan Weinert  
Director of Strategy  
Recycle Ann Arbor

Suzanne Jones  
Executive Director  
Eco-Cycle

Jeffrey Belchamber  
General Manager  
Community Conservation Centers, Inc.