



June 27, 2013

The Honorable Marc R. Pacheco
Chair, Joint Committee on Environment, Natural Resources and Agriculture
Massachusetts State House
Room 312B
Boston, MA 02133

The Honorable Anne Gobi
Chair, Joint Committee on Environment, Natural Resources and Agriculture
Massachusetts State House
Room 473F
Boston, MA 02133

Re: Massachusetts Senate Bill 374

Dear Chair Pacheco and Chair Gobi:

On behalf of the Glass Packaging Institute (GPI), our industry respectfully opposes Senate Bill 374, as presently drafted.

GPI is the North American trade association for the glass container manufacturers, glass recyclers, and suppliers of materials, equipment and transport to the industry. With respect to Massachusetts, GPI represents the Verallia glass container plant in Milford, which employs over 200 represented and salaried workers., in addition to the Strategic Materials, Inc. plant in Franklin, which recycles and supplies glass to our industry.

GPI's members recognize the importance of supporting sustainability initiatives including conserving energy, saving raw materials, reducing air emissions (including NOx, SOx, PM and greenhouse gases such as CO2) and being fully committed to "Reduce / Reuse" in all aspects of plant operations e.g. water, cardboard, lubricants, electricity, etc.

When glass plants can increase the levels of recycled glass as part of the overall batch mix, they can reduce furnace temperatures, resulting in reduced energy use and lower greenhouse gas emissions. For glass, one ton of carbon dioxide is reduced for every six tons of recycled container glass used in the manufacturing process. Energy use at the glass plants also drop about 2-3% for every 10% recycled glass used in the manufacturing process.

GPI and its member companies are focusing on a variety of collection programs

Glass Packaging Institute * 1001 N. Fairfax Street, Suite 301A * Alexandria, VA 22314 * (703) 684-6359 •

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to get glass containers back to our plants. A key element that all of the most successful programs around the country share, is the separation of the recyclables collected, which our industry has found greatly increases the opportunities for their eventual reuse in the manufacturing process.

Senate Bill 374 requests that the state examine the feasibility of implementing a statewide single stream recycling pilot program. While the legislation would require broader identification of the fiscal impact, regulatory barriers, grants, infrastructure and other technologies, it does not include other critical components that must be examined in any recycling program.

Specifically, the study as proposed, does not require an examination or investigation of the quality issues typically associated with single stream collection. This is particularly true with respect to glass food and beverage containers, that are often so contaminated in the single stream process that they are no longer salvageable or able to be resold for re-use in the manufacture of a new glass container or other product. We estimate that well over 40% of glass collected in a single-bin manner will eventually end up in landfills, or is used in one-time, low-value applications, such as a substitute for roadbed aggregate.

Massachusetts is fortunate to have one of the nation's ten recycling refund programs in place. These programs have proven highly effective in providing clean, well-sorted recyclable materials that are able to be repurchased by the glass container and other manufacturing industries. Collectively, these 10 states average a recycling rate for beverage containers of over 80%. The Verallia glass container plant in Milford utilizes on average, over 80% - 90% recycled glass in the manufacture of new containers. A statewide single stream program, if instituted, would result in more of the recyclables collected being lost to landfill disposal and have a detrimental effect on the industries that purchase them.

When evaluating single stream and other recycling programs, it is important to understand that collection rates usually refer to what is picked up at the curb, and not what is actually recovered and recycled. In contrast, and as mentioned, the vast majority of glass collected through beverage container recycling refund programs remains contaminant-free, is purchased by glass recyclers, and eventually, container manufacturers. This is also true for aluminum and PET beverage containers.

Any examination of a recycling program needs to consider the broader end markets, where the majority of the recyclables collected are repurchased. These end markets for the recyclable materials play a crucial role in the economic recycling supply chain. If industry is unable to purchase recyclables collected due to quality or other issues, then the entire recycling system will be negatively impacted.

GPI would like to thank the Committee for their consideration of our comments and for their interest in recycling. Please consider GPI and its member companies a resource and advocate for recycling related issues.

Sincerely,

A handwritten signature in black ink that reads "Lynn M. Bragg". The signature is written in a cursive style with a large initial "L" and "B".

Lynn M. Bragg
President

Cc: The Honorable Michael Knapik
The Honorable Bruce Tarr
The Honorable Randy Hunt
The Honorable Sal DiDomenico
Members, Joint Committee on Environment, Natural Resources and
Agriculture