

July 25, 2022

Mr. Dan Halpert
Resource Conservation and Sustainability Division
Office of Resource Recovery
Office of Land and Emergency Management
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20004

RE: Docket number EPA-HQ-OLEM-2022-0342

Dear Mr. Halpert:

The Flexible Packaging Association (FPA) appreciates the opportunity to respond to the Environmental Protection Agency's (EPA) request for information (RFI) on the Solid Waste Infrastructure for Recycling (SWIFR) grant program. The FPA was established in 1950 and is a national trade association comprised of manufacturers and suppliers of flexible packaging. The industry produces packaging for food, healthcare, and industrial products using coating and lamination of paper, film, foil, or any combination of these materials to manufacture bags, pouches, labels, liners, wraps, rollstock and tamper-evident packaging for food and medicine. The FPA encourages EPA to consider the following concepts as the infrastructure program is developed:

- **MRF Retrofitting:** FPA encourages grant support for the fitting of material recovery facilities (MRFs) with advanced sorting equipment that is able to identify and properly handle a wider range of packaging forms, such as flexible film and smaller items made of otherwise recyclable material. This equipment allows for an efficient and streamlined recycling process and promotes the capability for expansion of curbside recycling (discussed below). Materials Recovery for the Future (MRFF) is an example of this equipment. The MRFF was launched in 2015 by a broad coalition of vested stakeholders and recycling advocates to examine how existing mechanical recycling infrastructure could be harnessed to capture flexible plastic packaging. After exploring multiple methods of collection, sortation, and capture of flexible plastic packaging, MRFF created the first single stream recycling facility in the nation to accept flexible plastic packaging in its recycling program. MRFF's recycling facility, TotalRecycle, in Birdsboro, PA continues to demonstrate that it is both possible and profitable for a curbside single stream recycling program to bring in flexible plastic packaging.
- **Development of Advanced Recycling:** Advanced/molecular recycling through pyrolysis and gasification allows for an extremely significant increase in recycling capacities and efficiencies, particularly as it pertains to flexible packaging. Over 15 states have

introduced advanced recycling facilities into their infrastructures already. Two programs that have shown measurable success in utilizing advanced recycling technologies are the Hefty® EnergyBag® program and The University of Florida's Consortium for Waste Circularity (CWC) program. The EnergyBag® program collects previously non-recycled plastics and converts them into feedstocks that can be refined into high-grade fuels or converted back into plastics. Fuel blends are used as alternative energy sources through unique pyrolysis technology. This process not only creates energy used to power homes and cars but also achieves a 31% reduction in global warming potential (GWP) over landfilling. In addition, aggregate material can be used for concrete blocks, plastic lumber, and other building products as well as new plastic products such as park benches or chairs. In parallel, the CWC utilizes a robust gasification process that is capable of converting otherwise "difficult to recycle" and multi-layer materials into synthesis gas (syngas). This syngas can then be transformed into eco-methanol and new plastic products, achieving a truly circular loop. Further, as methanol is the primary feedstock component for many types of plastic, this creates new streams of post-consumer recycled content and offers a pathway for companies to achieve their sustainability goals. FPA encourages EPA to include advanced recycling in the grant program to support these facilities and promote the development of new ones.

- **Expansion of Curbside Recycling:** EPA should consider incentive grants for state and local governments to expand curbside recycling options and the range of materials collected. Providing access to curbside recycling to all U.S. residents will standardize the types of material that can be and are recovered across the country. FPA particularly encourages EPA to consider grant support for the inclusion of flexible packaging in curbside recycling infrastructure.
- **Support for Store Drop-off Recycling:** In the absence of curbside recycling for films and flexibles, store drop-off programs are extremely important for the collection and recycling of consumer flexible packaging. The Wrap Recycling Action Program (WRAP) has had great success focusing on increasing the recycling rate of plastic films through store-drop off, education, and a nationwide public outreach campaign that has reached more than 70 million people in the U.S. since 2014. Flexible films and packaging collected through the WRAP program are processed back into bags and durable composite decking manufactured by Trex Company, Inc. EPA should include store drop-off infrastructure in the grant program in combination with the expansion of curbside recycling in order to support short-term and long-term capacities for flexible recycling.

Thank you for the opportunity to provide information. Should any further questions arise, please do not hesitate to reach out.

Respectfully Submitted,



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