



June 21, 2017

Connecticut Task Force to Study Methods for Reducing Consumer Packaging that Generates Solid Waste
Connecticut General Assembly
Hartford, CT
Via email: Robin.Bumpen@cga.ct.gov

RE: June 21, 2017 Consumer Packaging Task Force Meeting

Dear Members of the Consumer Packaging Task Force,

Amazon has hundreds of employees in Connecticut, with facilities in Wallingford and Windsor. Additionally, we recently announced plans for a new fulfillment center in North Haven that will create over 1,000 full-time jobs. We also hire thousands of seasonal positions each holiday season—jobs that are often converted into regular, full-time positions. There are about 30,000 authors, sellers, and developers in Connecticut growing their businesses and reaching new customers on Amazon products and services. We're a company of owners, of builders, and we get our energy from creating and inventing on behalf of our customers.

We appreciate the opportunity to provide written information to the June 21, 2017 meeting of the Task Force to Study Methods for Reducing Consumer Packaging that Generates Solid Waste ("Task Force"). We understand that the legislative intent of the Task Force is to study methods for reducing consumer packaging – through source reduction, reuse, and recycling – that generates solid waste. We have shared below a description of Amazon's initiatives designed to reduce and enable the recycling of packaging waste to inform the Task Force's work.

At Amazon, we work to optimize the overall customer packaging experience. This includes driving improvements in the sustainability of packaging across Amazon's supply chain, starting with our own packaging and our own operations. About 31 million times a year, customers write to tell us they love how their products have been packaged. They also tell us when our packaging hasn't worked – when their products were damaged, when the box used was too big, or just too hard to open. This informs our packaging team and allows us and our vendors to improve packaging design and delivery. If it's serious enough, their feedback can automatically pull what we call "the Andon cord" to prevent a product from disappointing another customer.

We are pursuing waste reduction initiatives to promote easy-to-open, 100% recyclable packaging and to ship products in their own packages without additional boxes. We have developed a three-tiered packaging certification program, which includes: Amazon Frustration-Free Packaging, Ships In Own Container, and Amazon Prep-Free Packaging. We have included a description of Amazon's Packaging Certification Guidelines and case studies in Appendix 1 and 2 respectively. These initiatives have grown to include more than 1.3 million products and we continue to add more products every day. In 2016 alone, these initiatives eliminated more than 55,000 tons of excess packaging.

We are working with the packaging industry and brand owners to share the Packaging Certification Guidelines and drive packaging design that is consistent with our standards, is ready to ship, and does not require an additional overbox. These efforts include hosting an Amazon packaging summit with over 150 top brand owners across multiple product categories, sharing our Packaging Certification Guidelines with the Sustainable Packaging Coalition to engage the packaging industry, and educating brand owners through ongoing engagement across our retail operations. We are scaling certified packaging through coordination with industry-certified laboratories that conduct testing in accordance with the Amazon packaging certification standards. These laboratories will help us increase the rate at which certified product packaging is reviewed, approved and made available to customers.

We recommend that the Task Force consider packaging designed for online fulfillment as a best practice approach to sustainable packaging. Amazon's certified packaging standards drive right-sized packages that provide a better customer experience through easy access to the product, reduced damage (and the associated elimination of wasted packaging), and less material volume and packaging.

At Amazon, it's our mission to be the world's most customer-centric company, and we continue our efforts to provide customers with minimal, protective, and functional packaging. We appreciate the opportunity to provide this written submission to help inform the Task Force's study of approaches to reduce packaging waste. Further information is available at www.amazon.com/sustainability. Please let us know if you have any questions.

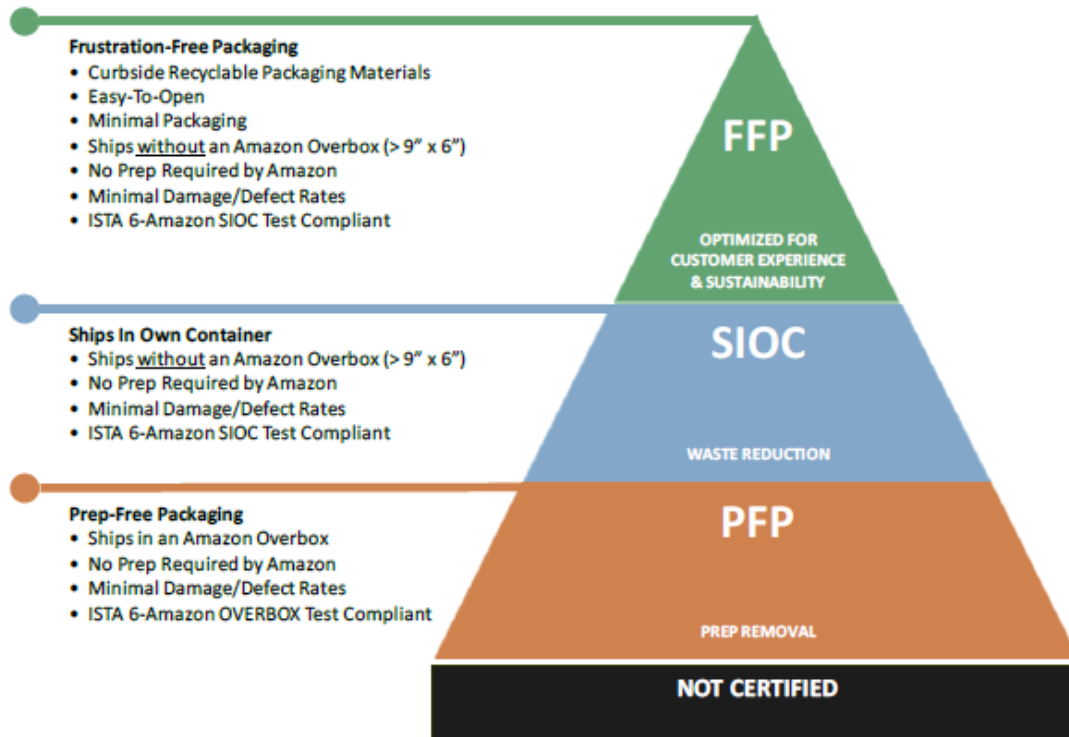
Sincerely,

A handwritten signature in black ink, appearing to read 'A. Fava', with a stylized, cursive script.

Andrea Fava
Director, Public Policy
Amazon
afava@amazon.com

Appendix 1: Amazon Packaging Certification Standards

Amazon Packaging Certification Pyramid



Frustration-Free Packaging (FFP)

Frustration-Free Packaging is the gold standard of Amazon’s packaging certification program and provides packaging that is designed with our customers and the environment in mind. FFP certified packaging is capable of shipping in its own container in minimized, fully recyclable and easy-to-open packaging. This ensures the most optimal experience for our customers.

Ships In Own Container (SIOC)

Ships In Own Container, our second tier of certification, minimizes waste through ensuring that packaging is designed to ship without the need for an Amazon overbox. Some products require additional protection using non-recyclable packaging materials such as foams to ensure minimal damage during shipment.

Prep-Free Packaging (PFP)

Prep-Free Packaging, our third tier of certification, is designed for items that are not capable of shipping in their own container (i.e. liquid product that is not six sided) requiring an Amazon applied overbox. A certified PFP package is designed to ship effectively without the need for Amazon to apply additional prep to prevent damage or leakage.

Appendix 2: Amazon’s Certified Sustainable Packaging – Case Studies

Standard retail packaging is designed to grab a customer’s attention by utilizing full-color glossy printing, being oversized to gain more shelf presence, or by employing windows, cutouts, and other costly packaging features not necessary for Amazon customers. By optimizing packaging for Amazon fulfillment and eliminating unnecessary package marketing features, Vendors and Sellers can reduce waste, enhance sustainability and realize cost savings.

When packaging is optimized for Amazon fulfillment, the package is “right sized” for the total supply chain. Smaller packages translate to lower transportation costs (more units per pallet/truck/container). It is also less costly for Amazon to ship that same package to the customer, saving money for both the Vendor/Seller and Amazon.

The following are examples of best-in-class products with packaging redesigned for Frustration-Free Packaging. The reduction in number of packaging components, packaging volume (cubic inches – in3) and air shipped (in3) is identified for each product.

Case Study 1: Norelco One Blade



Case Study 2: Rubbermaid Fresh Works



Case Study 3: Philips Hue Lightbulbs

