



The power of packaging in balance™

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](mailto:Robin.Bumpen@cga.ct.gov); [will@wintersbros.com](mailto:will@wintersbros.com); [vbelle@enviro-pac.com](mailto:vbelle@enviro-pac.com)

### **Re: Clarification on recycling statistics as reported by AMERIPEN at the June meeting**

Dear Members of the Task Force on Consumer Packaging,

AMERIPEN would like to express our appreciation for the opportunity to speak before the Task Force on the approaches our members are using to minimize packaging waste and direct resources towards recovery. We appreciate the State's considered approach to this challenge. In our presentation on June 21<sup>st</sup>, we shared some data drawing comparisons between the US and the EU. As this generated significant discussion, we would like to follow-up with written statements to clarify and provide more context behind some of the statistics we shared during that presentation.

References to specific countries are often used to highlight successful policy drivers; however, comparisons rarely use apples-to-apples data, which is why we felt it was important to point out EuroStat's most recent recycling numbers as compared to the US. For example, in the European Union, some recycling rates show recycling and composting as a percentage of all waste receiving final treatment, rather than as a percentage of waste generated or collected.<sup>1</sup> Conversely, recycling rates in the US are typically conveyed as a percentage of all municipal solid waste (MSW) generated.

In our presentation we noted that "when normalized, EU and US material recycling rates are similar." Total municipal solid waste recycled in the U.S. sits at 25.7%<sup>2</sup> while the EU records total MSW recycled at 29%.<sup>3</sup> These numbers refer to total materials recycled and do not include composting. When we add composting into the total mix of MSW diverted, the respective numbers advance to 35% for the US and 42% across the EU. We draw this comparison to note that overall there is not a statistically strong difference between diversion rates between the US and Europe at large.

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<sup>1</sup> Eunomia (2017) "Recycling—who really leads the world? Identifying the world's best municipal waste recyclers."  
<http://www.eunomia.co.uk/reports-tools/recycling-who-really-leads-the-world/>

<sup>2</sup> US EPA (2014). Advancing Sustainable Materials Management: Fact & Figures Report  
<https://www.epa.gov/smm/advancing-sustainable-materials-management-facts-and-figures-report>

<sup>3</sup> EuroStat (2015). Municipal Waste Statistics. [http://ec.europa.eu/eurostat/statistics-explained/index.php/Municipal\\_waste\\_statistics](http://ec.europa.eu/eurostat/statistics-explained/index.php/Municipal_waste_statistics)



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A study by Eunomia<sup>4</sup> notes: “around the world, recycling rates are widely reported—but not in ways that can easily be compared. Some eye-catching recycling rate claims need to be treated with caution”.<sup>5</sup> The report notes significant discrepancies in what materials are included under various categorizations (ex: the EU includes wooden pallets as packaging, the US does not), at what point is recycling measured (i.e. at the point of collection or what is truly processed) and whether the numbers include or exclude contamination. The Eunomia report attempts to normalize data amongst the top 25% of recyclers across the globe; while they do not compare the EU as whole, as we did, they do note drops in top performers such as Germany (reported at 87% total MSW but reduced to 54% when normalized)<sup>6</sup>. In contrast, the US rate reported at 26.7% increases to 34.6% under this approach.<sup>7</sup> Through this lens it is interesting to observe that normalized recycling rates across independent EU countries compare closely to recycling rates in many US states from both a population and recycling rate perspective.

As the Task Force is focused on ways to increase recycling, AMERIPEN would also encourage an evaluation of source reduction efforts. We believe efforts to optimize packaging waste at the design phase is equally as important as efforts to recycle at end of life. According to Eurostat, in 2014 the total volume of packaging waste per person across the EU has “reached its highest value since 2005” at an average of 161kg (0.18tons).<sup>8</sup> In contrast, packaging generation across the US peaked in 2000 and is now at an estimated 0.23tons per person, down from a peak of 0.27tons in 2005. Despite the larger cumulative volume of packaging in the US, it is difficult to draw direct comparisons when we consider lifestyle differences between the US and EU. Aspects like home size, prevalence of single versus multiple-family housing and distances travelled all drive differences in consumption and waste production. What is relevant to note however is that the US is decreasing cumulative packaging volume while the EU continues to increase. Additionally, when we compare packaging volume against gross domestic product, the US has successfully decoupled packaging waste from economic growth for well over decade now.<sup>9</sup>

In summation, we would encourage the Task Force to evaluate trends, and focus less on the specific numbers, as there are simply too many variable to drive meaningful comparisons. By using the data to explore trends we believe these studies suggest that effective means to reduce packaging waste

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<sup>4</sup> Eunomia (2017) “Recycling—who really leads the world? Identifying the world’s best municipal waste recyclers.” <http://www.eunomia.co.uk/reports-tools/recycling-who-really-leads-the-world/>

<sup>5</sup> Ibid. Slide 2

<sup>6</sup> Eunomia reports Germany counts all material processes through mechanical biological treatment although national estimates suggest only 6% of materials processed should be counted. Additional changes applicable to packaging include reporting contamination.

<sup>7</sup> Please note the Eunomia study refers to recycling of all MSW not just packaging rates.

<sup>8</sup> Eurostat (2017) Packaging Waste Statistics. [http://ec.europa.eu/eurostat/statistics-explained/index.php/Packaging\\_waste\\_statistics](http://ec.europa.eu/eurostat/statistics-explained/index.php/Packaging_waste_statistics)

<sup>9</sup> SAIC (2012) “Evaluation of Extended Producer Responsibility.” [https://www.gmaonline.org/file-manager/Sustainability/GMA\\_SAIC\\_EPR\\_Report\\_091112.pdf](https://www.gmaonline.org/file-manager/Sustainability/GMA_SAIC_EPR_Report_091112.pdf)



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require a toolbox of programs and policies that address the full lifecycle of the package and not just a focus on recovery of packaging at end of life. In pointing out similarities and challenges we hope this helps the Task Force in their efforts to further analyze best practices and effective policies and practices in their efforts to reduce packaging waste across the State.

We hope this helps supplement the discussion we had at the June 21<sup>st</sup> meeting and we look forward to continued dialogue with the Task Force to help identify the most effective approaches to increase the diversion of packaging across the State.

Sincerely,

A handwritten signature in black ink, appearing to read "Lee Anderson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Lee Anderson

President, AMERIPEN