

September 29, 2017

Connecticut Task Force
to Study Methods for Reducing Consumer Packaging that Generates Solid Waste
Connecticut General Assembly
Hartford, CT

Re: Life-Cycle Considerations for Consumer Packaging

Dear Task Force Members:

The Flexible Packaging Association (FPA) would like to follow-up our testimony in front of the Connecticut Task Force to study methods for reducing, through source reduction, reuse and recycling, consumer packaging that generates solid waste in the state. In its testimony, FPA stated that when looking at specific policies and programs that will help consumers reduce the amount of packaging they create and for reducing consumer packaging that generates solid waste, the report should take into consideration the entire life-cycle of the packaging and not just end-of-life management as well as energy recovery as a viable option. In the question and answer session, the Task Force asked for specific information on the concept.

Life-Cycle Planning & Sustainable Materials Management

This concept, recognized by the Environmental Protection Agency, is known as Sustainable Materials Management (SMM) (<https://www.epa.gov/smm>) and has been adopted by the Oregon Department of Environmental Quality in developing a long-term vision and to provide a foundation for updating the state's Solid Waste Management Plan (<http://www.oregon.gov/deq/mm/Pages/2050-Vision-Workgroup.aspx>). The University of Florida is also investigating SMM as a tool for that state under a grant from the Hinkley Center for Solid and Hazardous Waste Management (<https://www.essie.ufl.edu/home/townsend/research/florida-solid-waste-issues/hc16/>).

SMM seeks to reduce environmental impacts by managing materials throughout their lifecycle, including extraction, production, use and end-of-life management. In short, instead of looking at the percent of material recycled, it looks at the "environmental burden" associated with its production and management, including global warming; energy consumption/production; toxicity; acidification; eutrophication; ozone depletion; and water consumption. SMM uses data to analyze materials management strategies to the highest environmental benefits and allows efforts to be prioritized based on environmental and economic inputs. SMM also provides a scientific methodology to recognize waste to energy and more sustainable landfill practices, but still rewards recycling efforts. Lastly, SMM offers another possible pathway to a closed loop, circular economy for state planning and company product development - as it provides clear direction that can enable a company to make environmentally preferable choices in production and manufacturing as well as end-of-life management options, and allows a state

to plan and set objectives that focus state activity and resources toward the highest and best use for end of life managements.

Recommendations to Implement a Life-Cycle Approach

The above links have a wealth of information and resources for the Task Force to incorporate or summarize as part of its task of reporting on methods for Connecticut to reach its solid waste reduction, reuse, recovery and recycling goals for packaging. Specifically, the Taskforce and Connecticut could consider the following as elements of working toward achievable and sustainable consumer packing goals and practices:

- Recognize waste to energy as a pathway to continuing to achieve environmental progress;
- Consider sustainable landfill practices and other material storage options;
- Continue to reward recycling efforts and increase incentives for recycling; and
- Consider upstream packaging improvements as part of solid waste planning.

FPA hopes to see this overall approach and some of these recommendations as elements of the report, and as part of the many tools possible for the State to reach its goals. We appreciate the opportunity to provide additional comments to the Taskforce as it works to develop recommendations to the Legislature. FPA looks forward to reviewing the report and continuing to be a stakeholder in this process in Connecticut.

Sincerely,



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President & CEO