

June 26, 2023

Carolyn Hoskinson
Director, Office of Resource Conservation and Recovery
Office of Land and Emergency Management
Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington DC 20460
Submitted online via regulations.gov

RE: Recycling Infrastructure and Market Opportunities Map (Docket #: EPA-HQ-OLEM-2022-0933)

Dear Director Hoskinson,

The Flexible Packaging Association appreciates this opportunity to submit its thoughts and suggestions in response to the Environmental Protection Agency's (EPA) Request for Public Comment on its Recycling Infrastructure and Market Opportunities Map (EPA-HQ-OLEM-2022-0933) (The "Map").

The Flexible Packaging Association (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. Flexible packaging, a \$34.8 billion industry, employs roughly 79,000 people in the United States and is the second largest and fastest growing segment of the U.S. packaging market.

FPA supports the EPA in the creation of the interactive Recycling Infrastructure and Market Opportunities Map to help document the current state of recycling in the United States. We supported and were pleased to see EPA's National Recycling Strategy bill signed into law in 2021 and believe that the Map will be an excellent action item towards meeting the Strategy's objective for improvement in data collection. FPA and its membership have been heavily invested in efforts to develop the recycling market as we work toward the universal goal of developing a circular economy. FPA would like to offer comments and suggestions with regard to question one of EPA's request for comment: the accuracy and completeness of the data that

the Map utilizes. Specifically, FPA requests that the Map include data pertaining to film and flexible packaging.

FPA strongly urges EPA to include film and flexible packaging as a category within the Map. Flexible film is one of the fastest growing packaging materials and has been for some time. Mono-material polyethylene films are in high demand because the process to recycle mono-materials is more straightforward than that of multi-material film. Additionally, end markets for recycled flexible material are plentiful and continue to emerge. On the contrary, recycling infrastructure for flexibles has struggled to expand as it is largely only supported with store-drop off collection programs funded by industry groups. The recycling market's incapacity to keep up with a growing supply of flexible materials is extremely unsupportive to the movement towards a circular economy. Tracking relevant data on the Map will help to foster growth in store-drop off collection programs, as well as expansion of the range of materials collected through curbside recycling. FPA supports the development of both of these collection methods.

In congruence with our request for flexible packaging data to be included in the Map, FPA suggests that the EPA consider the inclusion of advanced recycling data as part of the resource. Advanced (or molecular) recycling through pyrolysis and gasification allows for an extremely significant increase in recycling capacities and efficiencies, particularly with respect to flexible packaging. Over 15 states have introduced advanced recycling facilities into their infrastructures, and technologies in advanced recycling continue to grow, particularly through programs such as the Hefty® ReNew® program and The University of Florida's Consortium for Waste Circularity (CWC) program. These technologies can help to fill the gaps in our recycling infrastructure to support the inclusion of films and flexibles in the recycling market, with respect to both mono and multi-layer flexible materials.

FPA encourages the EPA to work directly with material specific industry trade associations to help complete collection of the above discussed data for generation, access, and recycling, with regard to flexibles and other materials alike. Additionally, many state-based recycling agencies have data collections that were not referenced as a source for the Map but could provide a more detailed account of current infrastructure.

In conclusion, FPA appreciates the opportunity to submit these comments on recycling infrastructure and market data from the perspective of the flexible packaging industry. FPA supports the objectives of the Recycling Infrastructure and Market Opportunities Map and believes that our suggestions are in line with these objectives and will provide significant value to the Map overall. Should any further questions arise, please do not hesitate to reach out.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Abigail Trumpy', written in a cursive style.

Abigail Trumpy, Esq.

Director, Regulatory Affairs

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