City Council Committee on Sanitation and Solid Waste Management
Public Hearing regarding Intro 148
Designation for Recycling of Rigid Plastic Containers

City Hall
New York
April 26, 2010

Good afternoon Chairperson James and Committee Members. The American Chemistry Council (ACC) is a national trade association representing the plastics industry in New York and around the country. ACC strongly supports this effort to expand recycling to rigid plastic containers, which builds upon NYC's successful retailer plastic bag take-back program in 2008, and which will help to reduce the amount of material that goes to landfills. ACC welcomes the leadership role New York City is taking in expanding their recycling efforts and appreciates this opportunity to appear before the Committee and to share our support of the expansion of New York City's recycling program. Accordingly, my remarks will focus on the environmental benefits of recycling plastics, the creation of green jobs, and the benefits of increasing the collection of rigid plastic containers.

ACC strongly supports the inclusion of rigid plastic containers in NYC's program
Expanding recycling to rigid plastics will provide important environmental benefits. In fact, ACC recently completed a study[1] that confirms that recycling plastics saves energy and reduces greenhouse gas emissions. The study found that the amount of energy saved by recycling plastics containers in 2008 is equivalent to the annual energy use of more than 750,000 U.S. homes. The corresponding savings in greenhouse gas emissions is approximately 2.1 million tons of CO2 equivalents, an amount comparable to taking more than 360,000 cars off the road.

Recycling plastic also creates new "green" jobs. Recycling has consistently been shown to create more jobs—at higher income levels—than disposal.[2] According to one study, 93 jobs are created for every 20 million pounds of plastic recycled. This data points to a significant employment opportunity that may result from expanding recycling to all rigid plastic containers. After this program expansion, New York City's plastic collection should increase by 40 to 90 million pounds.

Adding New York City to rigid collection will dramatically increase national trend

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[1] "Final Report – Life Cycle Inventory of 100% Postconsumer HDPE and PET Recycled Resin from Postconsumer Containers and Packaging," April 2010, conducted by Franklin Associates Ltd., jointly sponsored by the American Chemistry Council, the Association of Postconsumer Plastic Recyclers, the National Association of PET Container Resources and the PET Resin Association.
[2] "Recycling and Economic Development A Review of Existing Literature on Job Creation, Capital Investment, and Tax Revenues, April 2009 Cascadia Consulting Group literature review sponsored by King County Solid Waste Division's LinkUp program.

By New York City taking a leading role in recycling expansion, NYC will reinforce and add important momentum to the strong growth in rigid recycling. In 2008 the recycling of non-bottle rigid plastics increased 11 percent from 2007, reaching 361 million pounds nationwide[3]. Today over 63 percent of California residents can recycle rigid containers curbside and communities around the country are adding these valuable materials to their recycling bins. Approximately, 1/3rd of the largest communities in US collect rigids for recycling including Los Angeles**,** Seattle, Dallas, and Boston. The American Chemistry Council has worked with Los Angeles, Philadelphia, and several towns within Florida, North Carolina and California to assist them in expanding their recycling infrastructure. Including New York City to this growing list of communities will add an important role model to the remaining communities around the country.

We also expect that expanding the types of plastic that can be recycled, will increase the recycling of other plastics including bottles. Adding types of containers makes recycling easier for families and has been shown to increase participation rates.

Through this effort New York City has an opportunity to expand on its recycling leadership demonstrated through the 2008 plastic bag recycling law. Following New York City's enactment of the bag recycling law, other cities and states have adopted bag recycling. ACC was delighted to work with New York City on the plastic bag and film recycling law and provide educational materials and bin signage. NYC's effort contributed to the nation-wide collection of over 832 million pounds of bags and film that were recycled in 2008, an increase of more than 28 percent since 2005[4]. NYC's effort has also positively impacted the continually growing recycling rate of polyethylene bag and film recycling, which EPA now reports is at 13 percent.

ACC supports the increased education on this new recycling opportunity

The legislation and other measures discussed today also call for education to accompany the expansion of recycling to rigid plastics. This education will help make this expansion successful and is very important. The American Chemistry Council strongly supports expanded education on recycling, and has crafted online and print literature and signage for plastic bag and all-bottle recycling education. In addition, ACC has worked with partners like Keep California Beautiful and California State Department of Parks and Recreation to place over 700 recycling bins on beaches and other public spaces in California since 2008. Organizations and interested citizens can visit the following web sites to learn more and request available educational materials: http://www.plasticbagfacts.org/, http://plasticbagrecycling.org/plasticbag/index.html, and http://www.allplasticbottles.org/stats.asp.

Additionally, ACC supports and contributes funding towards third party educational resources. To learn more, visit: www.earth911.com, and www.plasticsmarkets.org.

ACC encourages public input on cost-effectiveness of collecting rigid containers

The proposed legislation gives the Commissioner the ability to determine that the cost to the city of recycling one or more types of rigid plastic containers is not reasonable in comparison with the cost of collecting existing designated materials. In addition to documentation that the

[3] "2008 National Postconsumer Report on Non-Bottle Rigid Plastic Recycling," March 2010, conducted by Moore Recycling Associates, sponsored by the American Chemistry Council.

[4] "2008 National Postconsumer Recycled Plastic Bag and Film Report**,"** March 2010, conducted by Moore Recycling Associates, sponsored by the American Chemistry Council.

Commissioner must provide to the council on the factors that justified such a determination, ACC suggests that a public hearing and/or ability for representatives to provide input might be helpful in identifying ways to make the collection of such materials more profitable to the city. We expect that there may be some growing pains as collection of these materials are expanded and would welcome the opportunity to work with officials to overcome these growing pains and help make the program more profitable. We do expect that any growing pains can be overcome. Data from Moore Recycling over the last four years indicates that pound for pound mixed rigid plastic are more valuable to recyclers than cardboard. Therefore, we expect recycling of rigid plastics to be cost-effective compared to other materials. Furthermore, we expect the cost-effectiveness to improve with experience. Although the domestic infrastructure for recycling rigid containers is growing, accepting rigid plastics into NYC's recycling program will greatly boost the amount of plastic available for recycling. This boost will also demonstrate to recyclers that sufficient material exists to justify investment in processing which will lead to higher prices for rigid plastics over time.

The ACC respectfully requests that you support **Intro 148,**

Thank you for your time and consideration of our position and the information we have provided to you today.

American Chemistry Council

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