Bill Number: S.8008/A.9008
Committee: Environmental Conservation
Date: February 1, 2022
Position: Support inclusion

On behalf of Eastman, thank you for the opportunity to provide comments on S.8008/A.9008 – Extended Producer Responsibility Act. As attention increases on the waste crisis, it is vital that representative government, advocates, and private industry collaboratively develop solutions to recycle a broad range of these materials. As a private industry stakeholder, Eastman supports several components of S.8008/A.9008 and encourages the legislature to accept it into the final budget. As written, S.8008/A.9008 recognize the need for a material neutral approach to packaging EPR. It will fund necessary developments in recycling infrastructure, help create markets for hard to recycle materials, and is inclusive of innovative and truly circular recycling technologies.

Eastman supports the definition of "Recycling"

S.8008/A.9008 define recycling as the processing of source-separated packaging and paper products to produce a marketable product or secondary raw material and exclude thermal treatment processes where the most marketable output is fuel. This definition allows for material-to-material recycling processes beyond traditional mechanical or manual recycling and recognizes investments made by companies like Eastman to advance truly circular solutions.

A technology-neutral definition of recycling in policy and regulation is vital to address the market need for recycled content and recyclable packaging and, ultimately, drive the shift to a circular economy. Specifically, a definition should include a variety of processes that break down materials, including polymers, into basic building blocks used to produce new materials.

Approximately 300 million tons of plastic are produced globally each year. At end of use, 40% goes to the landfill, 25% is incinerated, and 19% is disposed of in unmanaged dumps or otherwise makes its way into our environment. Only 16% is collected for recycling. Of that 16%, only 9% is successfully recycled in US recycling systems.[1]

A narrow definition of recycling that only includes mechanical recycling methodologies would limit the types of plastic suitable for recycling and therefor, not adequately address the growing need to address the waste crisis. As established previously, the traditional recycling system is not equipped to provide the quantity or quality of materials needed to meet recycling goals. It certainly cannot support even more progressive future targets. New, advanced material-to-material recycling technologies exist to work alongside traditional recycling to support these goals, and a technology-neutral definition for recycling is critical.

[1] www.mckinsey.com/industries/chemicals/our-insights/how-plastics-waste-recycling-could-transform-the-chemical-industry

In certain cases, material-to-material advanced or molecular recycling can be complementary or advantaged to mechanical recycling within the circular economy. These molecular recycling processes should be recognized as the optimum solution from a greenhouse gas and carbon efficiency perspective for managing waste materials when:

i. The molecular recycling process prevents landfill or incineration of plastics that mechanical recycling cannot process.
ii. The molecular recycling process utilizes waste materials to directly replace fossil feedstock, enabling value from waste.
iii. The molecular recycling process has a carbon footprint equivalent to or better than the original manufacturing process for making the same product.
iv. The molecular recycling process produces products with equivalent or better performance relative to the original process.

Eastman supports a technology-neutral approach to the acceptance of advanced recycling when it meets the criteria and is truly material-to-material and not waste-to-fuel or waste-to-energy.

Eastman supports investments in recycling infrastructure and incentives for market development. We believe smart EPR policies that dedicate funding to consumer education and expanding recycling infrastructure are critical in ensuring the highest volumes of plastic waste are recycled.

The global plastic waste crisis is too big and too important for any one organization to solve alone. To create a truly circular economy, where resources retain their value infinitely, our country needs to bring the 65% of waste plastic lost to landfills, incinerators, and the environment back into the production cycle. Technologies exist today that give new life to waste plastic, but without the right policies in place, these solutions will not reach their potential for good. Together, we can create and foster a truly circular economy that addresses the plastic waste crisis at its source. Together, we can shape a sustainable future for the economy that includes plastics that are used, recycled, and reused again and again, supporting, and enhancing our overall quality of life while preserving our environment.

Eastman commends the state of New York and the Environmental Conservation Committee, the Senate Finance Committee, and Assembly Ways and Means Committee for pursuing the development of responsible recycling policy.

Kierstin Turnock
State Government Affairs – Circular Economy
Eastman
Kierstinm.Turnock@eastman.com