



Response to *Resource Recycling Inquiry* of Californians Against Waste report

September 29, 2014

Dear Bobby,

Thank you for giving us the chance to provide input to the article you are working on based on the Californians Against Waste report.

We've reviewed the CAW report and have found some parts inaccurate and/or misleading.

CAW favors the addition of cartons to the deposit system and makes that recommendation based on the fact that there is low volume of cartons, resulting in no incentive for MRFs to currently sort them. We agree that cartons are a lower volume commodity so the solution we have been working on for the last five years since formation of the Carton Council is to create sustainable recycling for all food and beverage cartons, both gable-top and aseptic, regardless of what they contain. Also mindful of the volume situation, we pushed for the establishment of Paper Stock Industries Grade #52, and not a separate aseptic and gable top grade.

The deposit system CAW has proposed for cartons in the past would actually split the stream, with only juice and milk substitutes being included while dairy and other products (foods) being exempt. If MRFs are claiming that the volumes of cartons are low and that is a deterrent to sorting them, the proposed system would in fact make the volume even lower, creating more of a deterrent. Additionally, it would be hard to combine the different types of cartons down the stream for recycling, resulting in a more inefficient system. In our view, CAW's recommendation would hurt carton recycling more than help. The Carton Council's plan looks to keep all cartons together and grow the volumes in MRFs to make it even more compelling for positive sorting.

Regarding the issue of MRFs separating cartons in California, the report claims that only 13 percent of the MRFs sort cartons because the remaining don't see the value in doing so. Here is a few things to note:

- Our data indicates that actually 15-17 percent of the MRFs in California sort cartons. And those are the large MRFs that serve 30 percent of all households in California with access to carton recycling today. There is a strong volume of cartons going through them.

- There is a claim in the report that MRFs don't know what happens to the cartons because they are sold to brokers. Many tons of other grades are also sold through brokers. This is standard practice and does not seem to be a valid argument against cartons not being recycled.
- CAW's suggestion that cartons be added to the deposit system reinforces that there is value to cartons. Getting all MRFs to sort cartons takes time. We've made tremendous progress since we began five years ago, and the fact that cartons are now being looked at like other beverage containers regularly recycled validates that.

The Carton Council believes that the best formula for preventing cartons from going to landfills is an all-inclusive approach that includes building infrastructure and access as well as consumer education. The components of this comprehensive approach we've deployed in California as well as nationwide, aims to achieve strong cartons recycling through:

- Proactive industry partnerships for voluntary producer responsibility
- Pushing carton-friendly financial and technical resources into the supply chain
- Capital and technical support for sorting facility upgrades
- Community/hauler communications and outreach support for carton recycling access
- Consumer education where infrastructure is built

While the recycling process, especially in California, can often be confusing, the bottom line message should be for residents to do their best to recycle all accepted materials in their local community recycling program. Instead, the CAW report serves to further confuse residents and will cause them to reconsider where they should put cartons, possibly resulting in more going into the garbage.

The recycling of food and beverage cartons is a reality in California and across the entire US. While it is not perfect, carton recycling continues to grow without taxpayer funding thanks to strong and voluntary industry investment and collaboration, as well as growing demand from the public and private sector recycling industries.

I look forward to speaking in greater detail in the near future.

Sincerely,

Jason Pelz
 Vice President of Recycling Projects for the Carton Council of North America
 Vice President, Environment, Tetra Pak



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