



August 24, 2012

The Honorable John Shimkus
Chairman, U.S. House Subcommittee on Environment and the Economy
U.S. House Energy and Commerce Committee
2125 Rayburn House Office Building
Washington, DC 20515

RE: Glass Packaging Institute (GPI) – Responses to Questions from Energy and Commerce Committee Ranking Member Henry Waxman – “The Increasing Manufacturing Competitiveness Through Improved Recycling Act of 2012”

1.) Have GPI’s activities at the local, state and federal level to improve the supply chain for recycled materials provided a benefit to the glass industry?

GPI and member companies at the state, local and federal levels continue their work to improve the supply chain of recyclables but there remain longstanding challenges, including lack of reliable data, which needs to be addressed to achieve a significant improvement in collection and recovery rates. For example, with respect to beverage containers alone, approximately 150 billion PET, glass and aluminum beverage containers (with an estimated annual value of \$3.6 billion dollars) are needlessly disposed of in landfills each year. Through partnerships with localities, recycling and other processing companies, significant benefit is provided not only to the glass container industry, but also to these and other companies in the supply chain, and the communities in which they operate.

When more recyclables are able to be reused in the manufacturing process, raw materials and other natural resources are conserved, energy consumption and air emissions (including greenhouse gases) are reduced, and burdens on landfills lessened (along with the associated tonnage-based tipping fees). By purchasing more recycled glass and other materials, developed in part through these efforts, all companies in the supply chain are sustaining jobs, contributing to the local, state and national economy and greatly assisting the environment - all of which are valuable economic, energy and environmental public policy objectives that far transcend and are quite independent of any particular benefit to individual companies.

2.) – Would the data and analysis produced under this draft legislation provide a benefit to the glass industry?

The data and analysis in the discussion draft would provide benefits to the glass



container, and the broad base of other stakeholders including municipalities, manufacturing, processing and recycling based industries. By working to identify the gap between the point of collection and the final end market, the manufacturing companies who purchase recyclable materials for daily use in their manufacturing processes gain a better understanding of their supply chain. As we stated in our testimony, the reduced energy use and associated greenhouse gas emissions levels realized when recyclable materials are used is significant and crucial as our industry works to comply with regulations under the Clean Air Act, state and regional programs and unregulated competition from importers. Glass container manufacturing companies often ship recycled glass significant distances for use in their manufacturing facilities. The discussion draft may assist in reducing the distance recyclables would need to travel and importantly, strengthen and grow recycling programs at the local level. Also helpful at the local level would be a closer examination of commonly utilized recycling programs, as municipalities choose the recycling program that is the best fit for their community.

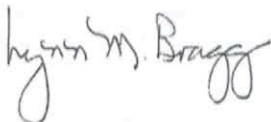
3.) – Would the industry to be willing to contribute to the costs of the data gathering and analysis envisioned in the draft legislation?

GPI membership contributes financial resources across the country (as well as globally) towards efforts, partnerships and organizations that target recycling efforts similar to those outlined in the discussion draft. As you are aware, the EPA already budgets for development of the current Municipal Solid Waste (MSW) Report to collect data on recovery and generation of recyclable materials. We believe the goals of the discussion draft will work within the framework of the existing Report and that the newly envisioned component would merely constitute a modest section of the Report going forward. Manufacturing and recycling industries, as well as municipalities, recognize the EPA MSW Report and the national value it provides across the spectrum of commodities.

Should funding for this, or a similar report be provided by any industry, there will likely be a perception that resulting efforts would demonstrate bias. GPI views the EPA's role in the evolution of the MSW Report as key to ensuring the integrity of the Report for use by the many public and private stakeholders who collectively "own" the recycling issue, along with the challenge of finding a sustainable solution.

Please do not hesitate to contact me if you have any follow-up questions to our responses.

Thank you,



Lynn M. Bragg
President