



July 25, 2023

U.S. Environmental Protection Agency  
EPA Docket Center  
Docket ID No. OLEM–2023–0228  
Mail Code 5306T  
1200 Pennsylvania Avenue, NW  
Washington, DC 20004

Re: Comments on EPA’s Draft National Strategy to Prevent Plastic Pollution

Dear Madam or Sir:

We are writing in response to EPA’s request for comments on its Draft National Strategy to Prevent Plastic Pollution to reduce plastic and other waster from land-based sources into the environment (“Draft Plastics Strategy”). As the Agency seeks to finalize its strategy, we encourage EPA to consider the following perspectives of Pack Green as it relates to plastic production and output, recycling and waste management, shifting away from unnecessary plastic in favor of viable alternatives, and transitioning toward a circular economy.

### **I. About Pack Green Coalition**

The Pack Green Coalition (Pack Green) is a nonprofit organization representing sustainable packaging manufacturers and related companies. Pack Green works to educate and advocate for meaningful policies and laws that will advance the replacement of unnecessary plastic in packaging supply chains with sustainable alternatives. Through these efforts, Pack Green seeks to level the playing field for innovative companies that develop better, more environmentally-sound packaging products. Pack Green also supports and amplifies the proposition that alternatives to plastic packaging can help companies that use these products achieve their sustainability goals.

### **II. Pack Green Supports Efforts to Reduce Plastic Pollution**

Pack Green shares the goal of finding solutions to address the plastics pollution challenge. We support efforts to divert plastic waste from landfills and prevent—in the worst case—leakage into waterways and the landscape. While bolstering recycling efforts and infrastructure—including recognizing that chemical recycling and waste-to-energy processing are not tantamount to circularity—we firmly maintain that any effective plastic pollution strategy must address production at its source. This, by its nature, requires a concerted movement away from unnecessary plastic and toward more sustainable alternatives such as paper, particularly in packaging, which in the era of globalization and e-commerce is



one of the foremost contributors to waste. By way of analogy, one cannot stop a household flood without first stopping the excess flow of water.

### **III. Pack Green’s Proposed Policy Initiatives to Advance the Transition to a Circular Economy**

Pack Green firmly believes that EPA and government in general can catalyze and effect changes that will result in a drastic reduction in plastic pollution and move us away from the traditional “take-make-waste” approach to resources and production toward a more circular and sustainable model. The public policies for which we advocate include the following:

#### **A. Government Procurement**

We believe that government at all levels—Federal, state and local—should use its substantial purchasing power to prioritize packaging materials that are conducive to environmental stewardship. For many products, solutions are available right now and are already in use both in the U.S and abroad. There are numerous sustainable packaging alternatives available on the market today, including, but not limited to, paper, mycelium, seaweed, and wool. These packaging materials can protect glass or other breakable items during shipping. They are used to create sturdy, greaseproof, and easily disposable food containers. Even challenges to keeping food and pharmaceuticals below required temperatures during transit have been solved by utilizing some of these materials, all of which are far more recyclable than plastic and have a less deleterious impact on the planet if landfilled or leaked.

#### **B. Truth in Labeling**

EPA and other agencies should promote truth-in-labeling standards that require that products using recycling labels (e.g., the “chasing arrows” symbol) actually meet minimum recycling standards. In other words, if a product (such as thin film plastic that is used to make air pillows or bubble wrap) is technically recyclable, but only a *de minimus* amount of such film is actually being recycled, then it would not meet the minimum standard. We recommend that EPA join in the Federal Trade Commission’s review and update of its Green Guides with respect to deceptive environmental marketing claims relative to environmental impact. A product should not be permitted to be labeled or advertised as “recyclable” unless it is of a material type and form that routinely becomes feedstock used in the production of new products or packaging. Mere technical capacity for recycling is of little use if markets for post-recycled content for the product in question do not exist. Nor is mere access to a recovery facility adequate if the material rarely, if ever, actually is recycled and re-introduced into the economy with a reasonably equivalent economic utility.



### C. Extended Producer Responsibility (EPR)

Unlike many organizations that purport to represent paper manufacturers, Pack Green is a proponent of the policy commonly known as Extended Producer Responsibility (EPR). EPR is a program that shifts the financial responsibility for treatment or disposal of post-consumer products to manufacturers of those products. Several states have enacted EPR laws for packaging, including Maine, Oregon, Colorado, and California, and many more are currently debating their passage. Properly designed and administered EPR regimes incentivize better packaging choices by placing a heavier burden on the purveyors of materials such as plastic that are less recyclable and more negatively impactful to the environment. The result will be greater reliance on the types of sustainable packaging substrates that Pack Green supports and promotes, an outcome that will dramatically reduce plastic pollution.

We urge EPA to consider reference to and support of the foregoing policies in its Final Plastics Strategy.

### IV. PRC Responses to Specific EPA Questions

- EPA Questions: *Which actions are the most important and would have the greatest positive impact at the local, regional, national, and global levels?*

*What are the most important roles and/or actions for federal agencies to lead?* ☐

*Is your organization willing to lead an action or collaborate with others to implement the actions?*

- Pack Green Response: The paramount factor in curbing plastic pollution will be reducing plastic production and consumption. Recycling, reuse, and remediation are all laudable goals that should be supported and implemented whenever feasible. Nevertheless, none of these—nor any combination thereof—will be adequate without addressing the alarming proliferation of plastic into our economy, our waste management system, and, most unfortunately, our land and waterways. The policy issues outlined in this comment letter—government procurement, truth-in-labeling, and EPR—are tools that the Federal government, each state and each municipality in this country can employ to help ameliorate the rampant overuse of plastic, particularly in packaging. In addition, Pack Green welcomes the recent breakthrough in UN talks centered on execution of a legally binding treaty to regulate plastic. The United States should be at the forefront of these efforts to address the plastic crisis.

Once again, we appreciate EPA’s efforts in putting together its Draft Plastic Strategy and support its goals of reducing harmful pollution through the various tools it has at its disposal. Pack Green stands



ready to assist EPA and any other governmental agencies in whatever way it can to develop and implement its final strategy. We hope these comments are helpful toward that end.

If you have any questions about these comments, please contact James Asali at

[jasali@packgreen.org](mailto:jasali@packgreen.org).

Sincerely,

*James Asali*

James Asali  
Chief Executive Officer