



Jan. 31, 2018

To Whom It May Concern:

As You Sow specializes in analysis of waste, recycling and resource efficiency issues, and has engaged directly with numerous large publicly traded companies on these issues for more than 15 years. We have negotiated commitments with Coca-Cola and PepsiCo to increase bottle and can recycling, Dell and Apple to increase e-waste recycling, and Colgate-Palmolive and Procter & Gamble to make more of their packaging recyclable and to take responsibility for post-consumer collection and recycling of packaging.

These comments pertain to the SASB Exposure Draft of Standards for Food & Beverage Sector, Packaging Lifecycle Management, starting on p.131.

A general problem with this section is the outdated presumption that a registrant's responsibility for lifecycle management of packaging does not extend to the post-consumer phase. Extended producer responsibility (EPR) is cited as a risk in the last line of text in the opening description on p. 131. EPR should not be presented solely as a risk of cost and compliance impact but as an opportunity to improve resource efficiency and as an ongoing part of a company's stewardship responsibilities. More than 40 countries have EPR laws [requiring](#) companies to take financial or operational responsibility for post-consumer packaging. Unilever, for example, recently [suggested](#) that EPR be part of a company's social responsibility program to tackle the mounting challenge of ocean plastic waste.

In line with this, the concept of the lifecycle of packaging in this section needs to be amended to include metrics measuring a company's participation in the *post-consumer phase*, such as promoting compliance with EPR laws or specific financial contributions made to improve infrastructure of recycling through membership in groups like the Recycling Partnership of Closed Loop Fund, among others. (In countries with EPR programs, registrants are often already required by law to help pay for recycling and need to budget millions of dollars for it so at a minimum they could report on these payments).

Here are specific suggested changes:

Re metric code FBO103-17

Line 78. Metrics should no longer be just weight-based but rather disclosure of the number of product units placed onto market, listed by type of material used (i.e. plastic, glass, metal) used by registrant, not purchased. Alternatively, both weight and unit-based metrics could be requested. Recent light weighting of packaging materials has made obsolete in some cases the use of weight as the basic standard of measurement. As one example, according to materials processor, it takes an additional 10,000 16-ounce plastic bottles to make one ton of recycled PET plastic today than it did in 1980. The resulting impact can skew efforts to accurately assess the level of recycling. A company or recycler [may think it's collecting fewer materials](#) than before, because overall weight of materials collected plastics has declined, while it may instead be collecting far more actual units that have been light weighted. Continuing to use only weight as the metric makes it more difficult to determine how much packaging is being recycled; use of units collected is a more precise metric.

79. p. 132 – Renewable resources bullet – biomass definition is explained as “replenished at rate equal to or greater than rate of depletion.” This appears to be less than realistic, as many forests are not



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replenished faster than the rate of loss. Does this mean that under this language trees would not be considered biomass?

80. replace “total weight of packaging” weight with “number of total units.”

81. Second bullet discussing definition of recycling. This is a crucial issue that needs clarification. We agree that awareness of “available processes and programs” is critical to be able to define recyclability in regards to the ability for a registrant’s recyclable packaging material to actually be recycled. However, no metric is supplied as to what constitutes sufficient generally available programs to denote common recyclability. We suggest using the established U.S. [FTC environmental claims guidelines](#) that 60% of the population should have access to recycling of a specific material to be able to designate it as commonly recyclable. Further, a [recent study](#) found that only about half of U.S. households are automatically enrolled in curbside recycling. While 73% have theoretical access, an estimated 40% do not have access either because it is not available, or they are not willing to pay for it.

Re Metric Code FB0103-18

84. In line with previous comments about the need to supplement weight metric with unit metric, re text”...such as reducing packaging weight...” and “or number of units placed onto market.”

86. Add a new sentence: “The registrant shall discuss its policy position on use of extended producer responsibility (EPR) laws or systems for packaging, and the amount spent on compliance with various EPR laws or other financial or operational measures intended to increase the rate of collection and recycling or composting of post-consumer packaging.”

88. Should discuss contributions towards increasing levels of recycling.

Also, we propose an additional metric for the quick serve (fast food) industry companies: The percentage of locations where post-consumer meal packaging (cups, boxes, food plates, wrappings, condiments, plastic cutlery, etc.) are recycled. San Francisco, Seattle and other cities have ordinances requiring recycling or composting bins on-site for meal packaging. McDonald’s recently set a new industry standard for responsibility for post-consumer packaging by [agreeing to recycle](#) all such packaging by 2025.

Please contact me if you have questions. Thanks for the opportunity to comment.

Regards,

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