



AMERICAN
SUSTAINABLE
BUSINESS
COUNCIL

September 4, 2019

The Honorable Tom Udall

U.S. Senator

531 Hart Senate Office Building

Washington, DC 20510

The Honorable Alan Lowenthal

Member of Congress

108 Cannon House Office Building

Washington, DC 20515

Dear Senator Udall and Representative Lowenthal:

We write to you today to thank you for your leadership in addressing the important issue of plastic waste pollution. We appreciate the opportunity to provide comment on this comprehensive piece of legislation and would welcome the opportunity to work with you to help identify effective solutions.

Today, products brought to market are too often in packaging that is excessive, unsustainable or both. Globally, nationally and locally, packaging waste causes enormous environmental damage and good recovery solutions are not widely implemented. Sadly, many essential waterways, including the world's oceans, are being overwhelmed with plastic and other non-biodegradable packaging waste.

As a group, we would like to offer the following principles for your consideration as you draft legislation to tackle plastic waste pollution. These principles serve as a guiding star for our Sustainable Packaging Working Group as we work to create and support legislation that addresses the plastic pollution crisis, and we hope you take them into consideration moving forward.

1. **Circularity** – A circular economy is necessary to ensure that the resources of our Earth are available to meet our needs today and will be available to future generations to meet their needs. Policy solutions should be designed to promote and maintain materials circularity.

2. **Federal Role** – The Federal Government has an important role to play in setting baseline standards and requirements which will best achieve plastic waste reduction in a comprehensive, fair and transparent manner. It should also be responsible for incentivizing positive outcomes, in addition to partnering with industry to establish achievable targets and standards.
3. **Responsible Parties** – Responsible parties include materials manufacturers, packaging manufacturers, product manufacturers, retailers, consumers, states and municipalities responsible for waste management and waste management companies.
4. **Methods and Metrics** – Material recovery and materials reuse metrics should be defined and progress measured. Material recovery systems should start with clear identification of materials to allow for convenient and economical collection and sorting, at any point in the material's life cycle. Material recovery systems should be designed in the most economically efficient and easily implementable manner, possibly utilizing existing infrastructure and waste contract plans, and giving Responsible Parties flexibility to implement.

The proposed components of your legislation align with what we believe to be essential steps in moving the United States toward a truly sustainable economy. We as a working group would welcome the opportunity to suggest changes to strengthen your proposed legislation, and to more broadly be a resource to you and your staff as it moves through the legislative process. Our diverse expertise and broad network connections play an important role in identifying and implementing solutions and we look forward to working with you to advance common sense policies that are both good for business and our planet.

Sincerely,

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Carolina Leonhardt, Clif Bar

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