



american cleaning institute®

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July 28, 2023

Carolyn Hoskinson
Director, Office of Resource Conservation and Recovery
Office of Land and Emergency Management
Environmental Protection Agency (5101T)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Subject: Draft National Strategy to Prevent Plastic Pollution
Docket No. EPA-HQ-OLEM-2023-0228

Dear Ms. Hoskinson:

The American Cleaning Institute (ACI) appreciates the opportunity to provide written comments in response to the request issued by the Environmental Protection Agency (“EPA” or “Agency”) on the Draft National Strategy to Prevent Plastic Pollution (the “Draft Strategy”). ACI is the Home of the U.S. Cleaning Products Industry and represents the \$60 billion U.S. cleaning product supply chain. ACI members include the manufacturers and formulators of soaps, detergents, and general cleaning products used in household, commercial, industrial and institutional settings; companies that supply ingredients and finished packaging for these products; and chemical distributors. ACI serves the growth and innovation of the U.S. cleaning products industry by advancing the health and quality of life of people and protecting our planet. ACI achieves this through a continuous commitment to sound science and being a credible voice for the cleaning products industry.

The Save Our Seas Act 2.0 (the Act), which primarily focuses on ocean plastics, was a continuation of US efforts to tackle the marine debris problem. It called for scientific studies to address knowledge gaps in a variety of areas, particularly in how prevalent microplastics and microfibers are in our drinking water and food. It also requires EPA to address the issues with our recycling systems in hopes of making recycling more prevalent and minimizing plastic marine debris. Consistent with the Act, ACI strongly supports efforts to reduce plastic waste and minimize plastics in the marine environment.

ACI welcomes the issuance of the Draft Strategy by the EPA as a means to begin to fulfill Section 301 of the Act which required EPA to develop a strategy to improve post-consumer materials management and infrastructure for the purpose of reducing plastic waste and other post-consumer materials in waterways in oceans. We encourage EPA’s efforts to identify actions needed to eliminate the release of plastic waste from land-based sources into the environment, and act accordingly.

ACI shares EPA’s belief that new and innovative approaches are necessary to reduce, reuse, collect and recover plastic waste materials. As the world continues to move to a more circular economy, ACI believes there are steps that policymakers can take to improve our recycling systems and encourage the adoption of more sustainable practices. We therefore welcome the opportunity to share our comments on

the Draft Strategy. Our comments below address questions for which EPA specifically requested answers and/or comments.

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

Plastics play a significant role in the economy. Plastic packaging, especially for cleaning products, provides a variety of benefits. Packaging allows the safe transport of products to the home, allows for safe storage and use of products and conveys important safety information. ACI also believes that plastic use must be in a fashion that conserves resources and minimizes the environmental impacts of plastics and plastic products.

ACI and its members are committed to taking steps to improve recycling systems and encourage the use of sustainable recycling practices. ACI's ambitious goal is to achieve 100% collection and reuse, recycling or composting of cleaning product packaging waste by 2040 as outlined in our [Circular Packaging Roadmap](#). ACI believes that EPA's goals of reducing plastic waste and promoting recycling will best be met by understanding which public policies best address and promote recycling and the proper handling of waste, particularly in communities that are overburdened by pollution, and then acting on that knowledge. Furthermore, ACI believes that EPA must work with industry to eliminate consumption of single-use, unrecyclable and frequently littered products to the greatest degree possible. This approach will help to significantly advance the possibility of meeting crucial pollution prevention goals. Specifically, ACI suggests that EPA focus efforts in four specific areas: data collection, consumer education, reduction of single use-plastic manufacture and consumption; and increased availability of recycled plastics.

Data collection

In the Draft Strategy, EPA identifies a number of data collection activities. EPA has proposed to conduct a study of the effectiveness of existing public policies and incentives on the reuse, collection, recycling, and conservation of materials. This would include research and identification of obstacles to reuse. EPA also proposed to research the use and environmental impacts of certified compostable plastic products to determine if such products truly aid in reducing plastic pollution. Another subject for study proposed is to conduct analyses on the cost, effectiveness, and equity of policies/programs addressing the problems of litter, illegal dumping, and unintentional spillage of trash, in particular in disadvantaged and vulnerable communities. ACI believes that a vital component of implementing any policy is measuring key performance indicators. For our nation to embark on a journey to improve our recycling performance, we must understand who is recycling, what is being recycled, where it is being recycled, and why these activities are not happening. This data will help EPA and industry to understand our recycling needs and measure our progress moving forward. ACI supports these proposed studies and encourages EPA to collect the data critical to crafting and implementing effective policies.

Consumer Education

The success of America's recycling accomplishments depends on a vast number of stakeholders who are each valuable participants in the recycling value chain. However, a significant amount of success will depend on consumers who are equipped with information about what they can recycle, the benefits of recycling, and where to recycle, to ensure that the recycling stream can maintain its circularity by extending and closing the loop.

EPA has proposed to review, develop, update, and use sustainability standards, ecolabels, certifications, and design guidelines that focus on decreasing the environmental impacts of plastic products across their life cycle. Along these lines, EPA has proposed to explore the development of an accredited, voluntary third-party certification program for plastic recyclers to increase the safe and effective management of

plastic recyclables in the United States. These tools would help consumers identify those products that have a better recyclability profile.

EPA has also proposed increasing awareness among businesses of the Federal Trade Commission's Guides for the Use of Environmental Marketing Claims ("Green Guides") as seen in recent comments submitted to the FTC. This proposal could work in tandem with the development of a mechanism to evaluate claims made by companies about the degradability of plastic products to eliminate "greenwashing" and misleading claims by marketers. Raising this type of awareness supports the use of other claims such as "recyclable" and "recycled content" to increase solid waste collection and prevent plastic packaging from entering improper disposal pathways. These initiatives could also aid consumers make better informed choices on the products they purchase and use.

Lastly, to aid consumers in understanding the importance of proper waste disposal and recycling, EPA has proposed to identify effective ways to increase public understanding of waste reduction, materials reuse, and composting options. EPA would also review plastic resin identification codes to determine if changes are needed to reduce confusion around the recyclability of plastic. ACI believes that all these efforts to educate consumers about waste, recycling, and sustainable product choices are vital to ensuring widespread adoption of sustainable plastic use practices, and a means to increase the availability of quality PCR content. To aid in this effort ACI developed a [cleaning product recycling guide](#) to help consumers understand how to recycle cleaning product packaging.

Reducing single-use plastics

ACI recognizes that the most effective way to be a responsible steward of the environment is to reduce our dependence on virgin materials and natural resources. In furtherance of that goal, EPA has proposed to identify single-use, unrecyclable, or frequently littered plastic products and identify alternative materials, products, or systems with fewer impacts on the environment. With this knowledge, EPA could set specific goals to reduce the production of single-use, unrecyclable, or frequently littered plastic products. ACI endorses these efforts to address the use of single-use plastics to the extent that consumer health and safety is maintained. ACI supports the optimization of product packaging (e.g., right-sizing and utilizing concentrated products) and investing in reusable and refillable packaging formats, contributing to a more circular economy. Efforts such as these, adopted across the economy, would be a significant step to meeting recyclability goals. ACI supports these EPA proposals to address the use of single use, unrecyclable, and frequently littered plastic products.

Concerns

ACI cautions that transitioning to new packaging formats takes time and may not be applicable for all product categories in all markets. Single-use packaging ensures important anti-contamination properties that may not be guaranteed from certain reuse/refill systems. Non-plastic substrates may not be feasible for all cleaning products, and in fact may be necessary for some reuse/refill applications. EPA should allow consumer good product companies to evaluate which packaging formats offer the best environmental benefits, and make sure that adequate time is allowed for the transitions that do take place.

ACI also urges the Agency to consider that new product formulations that meet goals associated with reuse and circularity may then be hampered from entering the market due to EPA's slow-moving process for the review of new chemicals. The Agency could consider streamlining the review process, especially for new chemistries or formats that meet certain sustainability attributes, in order not to prevent the U.S. market from adopting more sustainable product formats and chemistries.

Increasing availability of post-consumer recycled plastics

ACI members have ambitious packaging goals that have created a demand for material that currently surpasses supply. To ensure that alternatives to single-use plastics are widely available, EPA has proposed

to create an innovation challenge program to develop alternatives to single-use, unrecyclable, or frequently littered plastic products. EPA has also proposed to focus on the development or expansion of capacity to maximize the reuse of materials. This could be accomplished by the provision of funding to communities, particularly those that have been unduly burdened by pollution, to create and implement plans to facilitate reuse. ACI supports these proposals and urges increasing infrastructure change both to increase recycling compliance by the consumer and yields at recycling facilities which will maximize the efforts set forth to make cleaning product packaging recyclable. Policies that expand access to recycling, modernize recycling technologies, invest in a broad range of recycling technologies, and create cleaner streams of material are critical to ensuring a reduction of plastic pollution.

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

ACI members strive for all cleaning product packaging to be circular. Completing that circle requires cooperation and collaboration from multiple stakeholders, from package creators to recyclers and back again. ACI believes that collaboration is essential to solving the issues surrounding plastic waste and recycling. We are committed to working with external stakeholders to evolve systems of recovery to eliminate cleaning product packaging waste. We know that some of our most important partners in that mission are federal and state governments. This includes collaborating with entities in other sectors of the economy in a similar place in the supply chain, as well as all interested parties in the circle – packaging and product designers, packaging manufacturers, product distributors, retailers, and waste management and recycling entities. A united and unified industry commitment to address plastic pollution can have a dramatic effect. ACI looks forward to engaging with both EPA and other industry stakeholders in meeting the challenge of plastic pollution head-on.

Conclusion

ACI remains committed to working with EPA on finding solutions to the plastic pollution issue. EPA has proposed many initiatives to address this issue. ACI strongly believes that any efforts to address plastic pollution should be focused specifically on information gathering that can be used to effectively address plastic use and recycling and consumer behavior. In implementing this strategy, ACI urges EPA to consider possible pitfalls that could impact the safe use of cleaning products and encourages an approach to recycling that includes the breadth of available technologies. In addition, EPA should ensure that new products that have sustainability attributes aligned with the goals laid out by the Strategy do not face unnecessary roadblocks from other Agency regulations. We appreciate the opportunity to comment on the Draft Proposal and look forward to continuing our dialogue with EPA on these issues in the future.

Sincerely,



Nathan Sell, ACI Senior Director of Sustainability



Darius Stanton, ACI Director of Regulatory Science