



american cleaning institute®

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submitted electronically via regulations.gov (Docket ID No. EPA-HQ-OLEM-2022-0375)

Carolyn Hoskinson
Director
Office of Resource Conservation and Recovery
United States Environmental Protection Agency (EPA)
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Subject: Recycling Education and Outreach; Grant Program and Model Recycling Program Toolkit; Request for Information
87 Fed. Reg. 35197 (June 9, 2022): Docket Number EPA-HQ-OLEM-2022-0375

Dear Ms. Hoskinson,

The American Cleaning Institute® (ACI)¹ appreciates the opportunity to provide written comments to the Environmental Protection Agency's (EPA) Request for Information (RFI) on *Recycling Education and Outreach; Grant Program and Model Recycling Program Toolkit*². ACI's member companies are the manufacturers, formulators, and distributors of cleaning products in the United States. ACI recognizes the need to mitigate the impacts associated with the creation, use, and disposal of our product packaging. Cleaning product packaging is designed to protect the health and safety of consumers and their families, while also ensuring safe transport, storage and use of cleaning products during all stages of a product's lifecycle. ACI's comments below address some of the actions ACI and its members are taking to ensure cleaning products are environmentally sound and their efforts to help educate communities and organizations on recycling.

ACI supports the Agency's use of educational and outreach tools and grant funds to improve waste prevention, increase recycling and reduce contamination in the recycling stream. Consumer education is imperative to having an effective recycling system, ensuring that packaging is re-entering the recycling stream. To help consumers better understand how to

¹ACI 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.

² Request for Information: Recycling Education and Outreach; Grant Program and Model Recycling Program Toolkit, 87 Fed. Reg. 35197 (June 9, 2022), <https://www.federalregister.gov/documents/2022/06/09/2022-12458/recycling-education-and-outreach-grant-program-and-model-recycling-program-toolkit-request-for>

recycle cleaning product packaging, ACI recently released a recycling guide³, aimed at improving the amount of cleaning product packaging entering the recycling stream with the least amount of contamination possible. ACI also supports EPA's development of model recycling program toolkit to assist states, tribes, and local government in enhancing or expanding recycling programs and infrastructures.

Optimizing product packaging and recycling is a priority of ACI member companies. ACI wishes to ensure OLEM personnel are fully aware of and have access to some of the tools and information sources ACI has available concerning cleaning product recycling. ACI has established guiding principles that help us ensure our products, which provide hygiene and cleanliness, do so in a manner that is environmentally sound, socially responsible and economically viable without compromising the ability of future generations to meet their needs. Our members have collaborated on guidelines to help direct design and manufacturing, and to aid in the development and use of recyclable packaging. We have also charted a roadmap aiming to achieve 100 percent collection and reuse, recycling or composting of cleaning product packaging waste by 2040.⁴ To achieve this ambitious goal, we must work with external stakeholders such as EPA to evolve systems of recovery. ACI's guiding principles, guidelines, and roadmap can also help inform EPA's recycling toolkit to inform communities on approaches to improve recycling. ACI would be pleased to meet with OLEM personnel to discuss and provide additional background on these materials and consider areas for potential enhancements that would contribute to EPA's program and outreach efforts.

ACI supports the Agency's objectives and use of funds to promote a common understanding of which materials are suitable for collection and recycling, and to ensure common terms and definitions in this regard are used and understood by the users of cleaning products. ACI would be interested in collaborating with appropriate OLEM personnel as they look for ways to effectively encourage the creation of recycling programs in communities and geographically challenging parts of the country where programs may be lacking, and to improve participation in recycling programs where rates are low, or contamination in the recycling streams can be reduced. Our members can assist in the use of commonly understood terms, symbols, and labeling that can contribute to successful collection and reclamation of cleaning product packaging that is suitable for recycling.

ACI appreciates the opportunity to comment on EPA's RFI on *Recycling Education and Outreach; Grant Program and Model Recycling Program Toolkit*. We invite any questions about this submission and look forward to EPA's response.

Sincerely,
Kathleen Stanton



Associate Vice President, Technical & International Affairs

³ <https://www.cleaninginstitute.org/sustainable-cleaning/cleaning-product-recycling>

⁴ <https://www.cleaninginstitute.org/industry-priorities/sustainability/sustainability-goals/goal-value-nature>