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**From:** Christopher Fleck; **Ex. 6**  
**Sent:** 10/19/2017 4:51:53 PM  
**To:** StClair, Christie [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=06618c5ed0e744a3bfe8443360018c26-StClair, Ch]  
**CC:** Coleman, Cheryl [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a002614aa0b240d698f09e4a7eafc8da-Coleman, Cheryl]; Bassett, Jay [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=642defb13ed942e49b61420a031bc367-Bassett, Jay]; Press [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b293283291dc44e0b5d1c36be9281d8a-Press]; Cohen, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9ccb5ca54a43d991d65e8c884bfd4-Cohen, Nancy]  
**Subject:** Re: Interview request for Resource Recycling magazine story on WRAP program

Hi Christie,

Thank you for the responses, very much appreciated. I know these answers will go a long way as I piece this story together. I will be sure to attribute quotes/responses accordingly.

Thank you,

Chris Fleck



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On Thu, Oct 19, 2017 at 9:15 AM, StClair, Christie <[StClair.Christie@epa.gov](mailto:StClair.Christie@epa.gov)> wrote:

Hi Chris,

Please attribute the info below to an agency spokesperson.

Thanks,

Christie

1. To what degree is the EPA supporting the ACC's (FFRG) WRAP program? Is the agency providing any specific resources for support?

➤ EPA entered into a Memorandum of Understanding with the American Chemistry Council's (ACC's) Flexible Film Recycling Group (FFRG), as well as the Sustainable Packaging Coalition (SPC) - an initiative of the Green Blue Institute (GBI) - on November 15<sup>th</sup>, 2016. The purpose of this MOU was to establish a process to collaborate on initiatives of mutual interest in order to promote the reduction, reuse, recycling, and recovery of plastics. One of these initiatives is ACC's Wrap Recycling Action Program (WRAP), which aims to increase the volume of plastic wrap, film, and bags being recycled in the U.S. through effective public education and outreach to consumers and businesses on what polyethylene film can be recycled and how best to collect polyethylene film for recycling by end-use markets.

EPA, ACC, and SPC have established a WRAP steering committee to help guide future WRAP efforts.

➤ EPA is not providing specific resources to ACC, however EPA does make information on WRAP available to partners and stakeholders as appropriate. The EPA Regions are also engaged with WRAP through the various cities and states that have joined the program. For example, EPA Region 4 is working with ACC, the City of Atlanta, Atlanta Recycles, the Georgia Recycling Coalition, and various companies with a major footprint in Atlanta (e.g., Publix, Kimberly Clark, Coca-Cola) on a PE film recycling campaign in Atlanta.

2. Given the EPA and ACC partnered about one year ago on the WRAP program, is the EPA taking any specific measures to evaluate the analytical effectiveness the WRAP program is having in reducing environmental impact from plastics?

➤ The EPA Regions supporting WRAP under the MOU are working with ACC (FFRG) and other WRAP partners to develop and evaluate performance measures that support meeting the MOU goals of increasing polyethylene film recycling, increasing participation in film recycling, and reducing film contamination in material recovery facilities. For example, the City of Atlanta and the Recycling Partnership have joined to conduct capture rate studies in conjunction. The studies have shown a reduction in film contamination in the city's residential recycling bins and an increase in the quantity and quality of materials being recycled. Outreach related to this effort has been linked with WRAP's message promoting retail-based film take back. Initial observations from the City indicate that the campaign has led to a significant reduction in bag and film contamination within its recycling stream (between one half and two thirds).

A similar campaign implemented in Massachusetts through the Recycling Partnership indicated a 30% reduction in film contamination. Data gathered as part of the Recycling Partnership's Materials Recovery Facility (MRF) working group shows that film has the second greatest impact in terms of costs of contamination on recycling operations. WRAP could enhance local government recycling program performance by offering recycling access for these commodities.

➤ EPA is co-convening the Measurement Matters Summit (February 2018) in Chattanooga, TN to bring top solid waste management leaders, trade organizations, and industry together to break new ground in understanding and defining “measurement” as it relates to materials management. The agenda includes a day on measurement and metric improvement. Learnings and approaches will be shared with ACC and SPC through this forum and to inform and enhance measures to evaluate WRAP program implementation and effectiveness.

3. In comparison to other plastic film recycling initiatives of the past, how does the WRAP program measure as a sustainable solution for plastic film recycling?

➤ We are not aware of any other national film recycling programs.

➤ Per ACC, WRAP has reached over 12,000,000 people in nearly 70 communities, providing access to film recycling opportunities at more than 18,000 store drop-off locations. Six states (Oregon, Washington, California, Michigan, North Carolina, and Connecticut) are current WRAP Champions and have adopted WRAP into their respective recycling programs.

➤ EPA’s report *Advancing Sustainable Materials Management: Facts and Figures 2014* indicated a 12.3% national recovery rate for film. This rate has been nearly static since 2010, when 11.5% of film waste was recovered nationwide. WRAP represents a scalable opportunity to impact and increase the national film recovery rate and to provide secondary feedstocks for manufacturers.

4. Can you provide any information on China’s recent restrictions of post-consumer recycling imports and the effect it will have on plastic film recycling progress in the U.S.?

➤ We are aware that the government of China has notified the World Trade Organization of a proposed ban on the import of certain types of imported materials. We are also aware that some U.S. companies and organizations in the recycling sector have concerns about this policy. We are following this issue and hope to better understand the potential impacts to domestic recycling programs.

5. How can we better engage both consumers and stakeholders in furthering the effectiveness of the WRAP program and other programs that may spawn from it?

➤ EPA plays a convening role with key stakeholders and partners to build cross-organizational collaborations towards a systems-based approach to increase the quality and quantity of recyclable materials collected and processed. This has included convening multiple stakeholder dialogues to explore opportunities for strategic alignment and long-term partnerships among organization to make a greater impact on recycling and recovery as part of a reverse supply chain. These dialogues have fed into SPC and the Recycling Partnership’s “Applying Systems Thinking to Recycling” project, which is aiming to build a roadmap for a stronger American recycling industry.

➤ In addition to initiatives like the WRAP partnership and other efforts to promote sustainable packaging, other EPA programs are working to understand the impacts of plastic pollution better and to keep plastic trash from entering water in the first place. For example, EPA's Trash Free Waters program is working with public and private sector stakeholders to take action to reduce the amount of litter and packaging waste that enters U.S. waterways and coastal ecosystems. <https://www.epa.gov/trash-free-waters>