



March 18, 2026

The Honorable Isaac Bryan, Chair
Assembly Natural Resources Committee
1020 N Street, Room 164
Sacramento, CA 95814

Re: AB 2253 (Boerner) Mass Balance Accounting Recycled Content – Oppose

Dear Assemblymember Bryan:

The Glass Packaging Institute is opposed to AB 2253 by Assemblymember Boerner pertaining to the use of mass balance accounting in determining recycled content in packaging.

We understand the goal is to address questions raised regarding certain “mass balance” calculations, credits and accounting methods related to other materials’ recycled content calculations. However, as it applies to glass container manufacturing, this bill would create new legal questions regarding widely accepted methods for calculation of recycled content for glass containers that are inconsistent with California law and definitions in other packaging laws around the country.

Simply put, because of the way container glass is manufactured, during which ingredients are added to a furnace batch mix in the container plant at the time of production on a continuous basis, the amount of recycled content is measured over a period of time as a percentage of total glass output. This is generally regarded as a form of mass balance measure called “rolling average.” While we see an effort in the amended language to distinguish the different types of claims for recycled content, we are concerned that this definition creates some confusion for recycled content for glass.

The requirements for recycled content for glass are already clearly established under California law and have been for over twenty-five years. The industry

reports recycled content usage to CalRecycle and has consistently met those recycled content goals and requirements. There is no need to include glass in any new recycled content law definitions or requirements.

For the above reasons, GPI respectfully opposes AB 2253 and would ask for your NO vote.

Sincerely,

A handwritten signature in black ink that reads "Scott DeFife". The signature is written in a cursive style with a long horizontal stroke at the end.

Scott DeFife
President

cc: Assemblymember Tasha Boerner
Members, Assembly Natural Resources Committee
Consultant, Assembly Republican Caucus
Edelstein, Gilbert, Robson & Smith