



February 14, 2023

Testimony of the Glass Packaging Institute (GPI)
Scott DeFife, President

Joint Legislative Hearing on the New York State Budget - Environmental Conservation
Division

Dear Chairs Krueger, Weinstein, Harckham, Glick, and Members of the New York State Senate and Assembly:

On behalf of the Glass Packaging Institute (GPI), I am pleased to provide information and perspective on the Environmental Conservation Division of Governor Hochul's SFY 2023-2024 budget.

GPI is the North American trade association for the glass food and beverage manufacturing companies, glass recycling processors, raw material providers and other supply chain partners within the industry. GPI and its members work closely with local and state governments throughout the country on issues surrounding sustainability, recycling, packaging manufacturing and energy use.

Glass Container Manufacturing & Glass Recycling in New York

New York is home to two glass container manufacturing plants, O-I Glass in Auburn and Anchor Glass in Elmira. Collectively, these plants produce several million bottles every day, many destined for local and regional customer end markets. Both of these companies, alongside the broader glass manufacturing and recycling industries stand to be impacted by provisions within the Governor's proposed budget.

Supporting the production of these glass bottles are glass recycling facilities in Farmington and Jamaica, Queens. This is in addition to hundreds of bottle redemption machines and facilities throughout the state, where consumers redeem covered containers for their eventual use in the production of new bottles and jars.

Glass Container Recycling Background

Glass is a core circular packaging material - reusable, refillable, and endlessly recyclable. The vast majority of glass containers are for food or beverage products, and glass is the only packaging material generally recognized as safe (GRAS) by FDA for all food and beverage products. Public sentiment strongly rates glass as one of the most supported

materials in the recycling stream, and glass has the strongest profile to aid in refillable beverage systems.

The glass container manufacturing industry has a significant stake in the effectiveness of glass recycling programs. Recycled glass is a key component of the manufacturing process. The industry purchases about 2.3 million tons of recycled glass each year and the average bottle or jar produced in the U.S. contains 1/3 recycled glass. For every 10% of recycled glass added to the batch mix, energy usage can be reduced 2-3 percent, with additional corresponding reductions in greenhouse gas emissions.

When you add the benefit of what is a better than 1 to 1 offset of raw materials saved by using recycled glass to make new containers, it is clear that using recycled glass has significant benefits to the environment of the region and should be prioritized.

Cap and Invest Program

Glass container manufacturing companies have considerable experience with the cap and invest/trade program in California, and one being developed now for Washington state. These programs were carefully constructed over time to ensure that purchases of emissions-reducing equipment, emissions reductions requirements, and compliance protocols could be met.

We were pleased to see that the budget acknowledges that Energy-Intensive- Trade-Exposed Industries (EITE), like glass container manufacturing, deserve special recognition within the program's parameters. Both California and Washington state have recognized EITEs as well, providing compliance credits, additional time, and other support so facilities may remain in state.

Glass container manufacturers in these states regularly compete with under-regulated container imports coming from across the globe. The ability to fully support EITEs at the onset of a cap and invest program and beyond, is absolutely critical for the future of New York's glass container manufacturing facilities and their workforce.

Packaging Recycled Content and Extended Producer Responsibility Principles

GPI has significant concerns with language that would require all glass bottles and jars sold in the state to contain 35% post-consumer recycled content, highlighted below:

Within five years of the effective date of this title, a producer of packaging products shall meet the following minimum postconsumer recycled content rates, as applicable, for the material types stated below: (a) All glass packaging sold or offered for sale in the state by a producer shall contain, on average, at least thirty-five percent post-consumer recycled content. Every three years thereafter, the amount of post-consumer recycled content shall increase by five percent, until reaching fifty percent.

EPR Section

Thank you for your consideration of our testimony. We look forward to continued opportunities for engagement, and remain committed to working with the legislature to constructively to enhance glass recovery and recycling in New York and throughout the region.

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