

Martin Vogt
President & CEO
EFS-plastics Inc.
5788 Line 84, Listowel, ON, Canada N4W 3G9
519-418-3377 ext. 3101
Martin.vogt@efs-plastics.ca

March 18, 2022

OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY

Re: Request for Information on Oregon Statewide Recycling Collection List

Dear DEQ Technical Workgroup and Rules Advisory Committee,

EFS-plastics Inc. would like to register support for the inclusion of certain foodservice packaging items on the "Uniform Statewide Collection List". EFS-plastics Inc. has three facilities in North America, including a new facility in Lethbridge, Alberta, and we are an end market for post-consumer materials sourced from Material Recovery Facilities (MRFs). We have been purchasing #3-7 mixed plastic from Oregon MRFs since 2019 to process at our facility in Listowel, Ontario, as our throughput capacity has grown rapidly in recent years. At our new Lethbridge facility, we are sourcing post-consumer olefins (mostly in the form of #3-7 or #1-7 commodity bales) to produce various grades of 100% PCR PP and PE pellets. We currently have a total capacity to process 55,000 metric tonnes post-consumer material annually.

We would like to take this opportunity to highlight how important it is to us to grow the supply of polyolefins (in particular PP) collected from households. As a recycler, we are seeing demand grow for PCR PP and PE over the next few years, and we are looking far and wide to get access to more material. We know there is a large volume of PP and PE that is not being appropriately collected or sorted in the Pacific Northwest and is unfortunately ending up in landfill. EFS-plastics is very eager to continue working with communities and MRFs in Oregon to incentivize them to keep these materials in circulation.

We procure the following MRF grades:

- 25,000 tonnes of #3-7 or #1-7 mixed rigid plastic
- 20,000 tones of Grade A-C and MRF-grade film
- 5,000 tonnes of PP/Tubs & Lids
- 5,000 tonnes of HDPE

The following foodservice packaging items are desirable in these incoming bales:

- Polyethylene Terephthalate (PET) Cups and Containers, including drink cups, clamshells, bowls, trays and other thermoformed containers
- Polypropylene (PP) cups and containers, including drink cups, deli tubs, clamshells, takeout dishes and lids and other PP thermoformed or injection molded containers

The following foodservice packaging items are acceptable in these incoming bales (i.e., we are happy to accept them because we can easily sort them from other materials, and it makes it easier for MRFs to recover more material that we do want.)

- Rigid Polystyrene (PS) cups and containers, including drink cups, clamshells, sandwich boxes and other thermoformed containers
- Expanded Polystyrene (EPS or Styrofoam) cups and containers, including drink cups and clamshells

As an end market for these materials with expanding demand from our customers, EFS-plastics wants to encourage the inclusion of these items in the statewide list to ensure an adequate supply to feed our growing operation.

Thanks very much for your consideration. We are happy to provide follow-up information upon request.

Best Regards,

A handwritten signature in blue ink, appearing to read 'Vogt', with a long, sweeping horizontal stroke extending to the right.

Martin Vogt
President & CEO