

# Recycling Modernization Act Material List Request for Information: Compilation of Selected Responses – Glass



## **Materials Management Program**

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State of Oregon  
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Environmental  
Quality

This document is a compilation of selected responses to DEQ's [Request for Information](#) regarding the potential for recycling different materials. As optional background reading materials for members of DEQ's Technical Workgroup on Material Lists, DEQ has selected the following response that addresses glass containers, which will be discussed at the July 19, 2022 Technical Workgroup meeting.

DEQ can provide documents in an alternate format or in a language other than English upon request. Call DEQ at 800-452-4011 or email [deqinfo@deq.oregon.gov](mailto:deqinfo@deq.oregon.gov).



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Materials Management Division  
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## **Comments for Section 22 - Oregon Statewide Recycling Collection List (Oregon Plastic Pollution and Recycling Modernization Act)**

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On behalf of the Glass Packaging Institute (GPI), I offer the following comments and perspective on the benefits recycled glass brings to Oregon, as the Department considers packaging and materials for inclusion on the statewide commingled recyclables collection list. This information is background for our continuing engagement with the Department and other stakeholders on the list, and how the EPR program is shaped in the coming months and years.

When glass container plants increase the amount of recycled glass added to the raw materials used to make glass (sand, soda ash and limestone), furnace temperatures can be reduced, resulting in less energy use and lower greenhouse gas emissions. This is a win for the glass companies with respect to energy costs, as well a win for consumers and Oregon's goals to reduce greenhouse gas emissions.

As long recognized by the Department, the environmental benefits of reusing recycled glass in Oregon (in contrast to landfill disposal), outweigh the impacts associated with raw materials extraction. By weight, glass containers on average comprise 25% of a curbside recycling program's volume. Consumer surveys conducted by the [Glass Recycling Coalition](#) over the past several years have also demonstrated that residents overwhelmingly expect to be able to recycle glass containers.

### **Section 22 Statutory Criteria**

As GPI reviewed the statutory criteria to be considered for the commingled collection list, we noted a number of key markers that glass in Oregon meets to be included in the primary list of materials to be recycled, including: the environmental and health benefits, viable, stable and mature end markets, the compatibility of the state's infrastructure, the ability of waste generators to easily identify the material, environmental factors from a life cycle perspective, the amount of material available for markets and the value of properly sorted recycled glass.

While a majority of Oregon's glass is collected in the states beverage container deposit program, the remaining glass only presents an issue in commingled single-stream recycling destined to materials recovery facilities (MRFs) lacking proper investment and/or sorting technologies. Through the Glass Recycling Foundation (GRF), GPI is actively engaged with MRFs through certification and educational outreach to improve the quality of glass being collected and sorted.

Glass enjoys a strong manufacturing base in domestic marketplaces, for many Oregon recycling companies, and throughout the country. As the Department may know, GPI member company, O-I Glass operates a bottle manufacturing plant in Portland, servicing beer and wine brands, and is a partner in a glass sorting and processing company called Glass to Glass, which provides high-quality recycled glass to the O-I plant.

O-I Glass purchases nearly 100,000 tons of recycled glass collected through a variety of programs throughout the state of Oregon. These programs include the Oregon Beverage Recycling Cooperative and its bottle bill program, dual-bin collection programs in many parts of the state, and importantly, glass collected through single-stream (commingled) collection.

O-I estimates that roughly 50,000 tons of recycled glass is collected in a residential, curbside manner, including commingled collection and glass on the side. Both O-I and Glass to Glass have significantly invested in sorting and other cleaning equipment to help ensure commingled glass can be re-melted in their furnace to make new bottles.

The viability of this important facility, which is a key cog in the beer and food industry, depends on quality recycled glass purchased from Oregon's recycling programs. Importantly, a portion of the commingled recycled glass used at the O-I plant comes from outside of the Portland/metro region.

Glass from Oregon that is processed through the state's processing facilities has circular end markets in Oregon, as well as plants in neighboring Washington and California. Increasing the amount of glass collected helps meet diversion goals for the State, improves feedstock desired by industry and increases recycled content levels for food and beverage packaging, helping them meet their sustainability goals.

Maintaining a viable non-deposit glass recovery and recycling program is necessary, given the state's allowance for the wine and spirits industry to consider its options to become a part of the deposit program, or participate in the new EPR PRO. It also will help capture food jars and other glass packaging not covered within the deposit program.

The Glass Packaging Institute and its members have an interest in seeing the glass recovery and recycling system in Oregon remain strong and set the standard for other states considering extended producer responsibility packaging laws.

GPI points to the expansion of the Glass Recycling Coalition's [www.glassrecycles.org](http://www.glassrecycles.org) MRF Glass Certification program, for best practices related to glass recycling in single-stream MRFs.

The nearly dozen MRFs that have been recognized for that program are evidence that glass can be handled well in commingled single-stream programs. The state PRO could determine that glass can be included in the commingled list.

At a minimum, glass needs to be included in the statewide recycling list and uniform collection lists and should be studied as a part of the commingled program.

Commingled are not necessarily limited to a single commingled stream. Virtually no European or Canadian EPR programs rely on single stream commingled recycling for their collection systems, and since Oregon already has one of the stronger state recycling systems in the US, it seems possible the PRO may conclude that an additional collection bin could provide more efficient incremental improvement to achieve the state's recycling goals.

There could be two "technically" commingled collections – one for paper, cardboard and fiber products, and another for rigid containers that are not under deposit. It is possible that glass could work in that system.

It is also possible that glass may be best served in a hybrid of separate "glass on the side" programs in more densely populated areas of the state, with an extensive drop-off or hub and spoke recovery programs in the Southern and Eastern parts of Oregon.

The GPI and industry have been studying a set of similar solutions for Eastern Washington and related rural "wine country" collection programs as a part of policy stakeholder meetings in Washington and California. The industry asks to remain an active participant in further dialogue, as the DEQ moves along to the next stage of the EPR rulemaking and stakeholder dialogue.

Thank you for your thoughtful consideration of our comments. Please reach out with any questions or comments you may have.

Sincerely,



Scott DeFife  
President