

March 18, 2022

Oregon Department of Environmental Quality

PET thermoform recycling. The National Association for PET Container Resources (NAPCOR) appreciates the opportunity to provide data that may assist the Oregon Department of Environmental Quality (DEQ) evaluate materials for inclusion in statewide recycling lists, which are being developed in accordance with Section 22 of Oregon’s Plastic Pollution and Recycling Modernization Act (Senate Bill 582). We can share proprietary data that may assist the Department’s implementation of the new regulations, particularly regarding PET thermoforms. PET thermoform recovery continues to grow as demonstrated by our annual PET Recycling Report (Figure A below). This annual report utilizes survey data directly reported by all PET reclaimers operating in the US and Canada. Our work to increase recovery of thermoforms dates back over a decade, yielding in recent years a substantial increase in PET thermoform recovery with reclamation of these packages doubling since 2016.

Oregon’s contribution. Although we do not collect state-specific data (we survey all reclaimers in the US and Canada but do not ask feedstock origin in our questionnaire), we have been able to estimate PET thermoform recovery in California (a bottle deposit state collecting PET thermoforms in curbside programs) using CalRecycle sort analysis of their Grade B PET bale (curbside mixed collection). Incorporating CalRecycle sort data applied to total PET shipped to reclaimers from Grade B bales we estimated 9.5 million pounds of PET thermoforms were recycled, or about 10% of all PET thermoforms recycled nationally in 2019. Although population differences would impact the quantity of PET thermoforms recovered in Oregon, we can anticipate an Oregon program similar to California (bottle deposits plus curbside collection of PET thermoforms) would yield a notable stream of PET thermoforms for reclaimers searching for additional supplies.

Recycled PET short supply. Recycled PET supply to final markets is short throughout North America illustrated by sharply elevated PET bale prices. Although Oregon does an excellent job collecting PET bottles through its deposit program, it is the exception and not the rule in post-consumer bottle recovery. Only ten states have deposit laws, resulting in a US bottle collection rate of only 27% (2020 data). End-markets for recycled PET are diverse with applications in carpet, textile, strapping and packaging applications. Weak post-consumer bottle collection coupled with sharply growing recycled PET end-markets amplifies the need to collect all PET packaging formats.

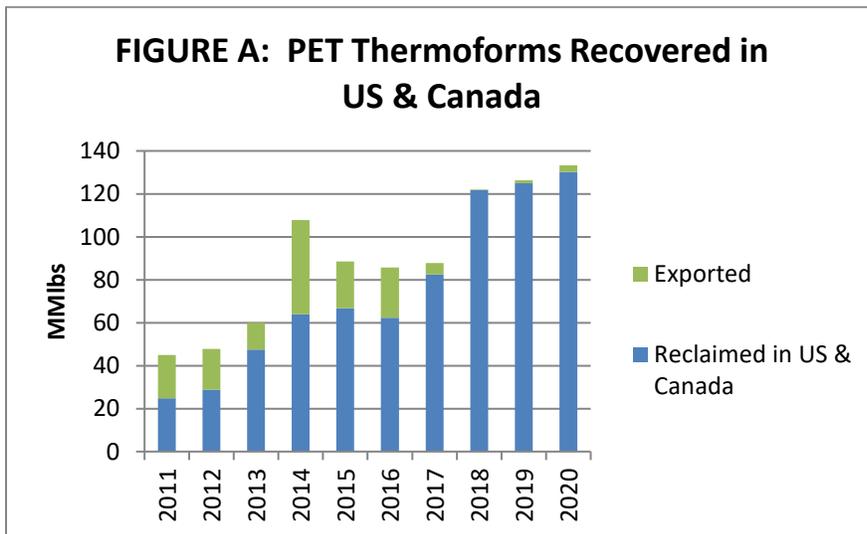
Advances in thermoform recycling. Although PET thermoforms are more difficult to recycle than bottles, particularly for reclaimers focusing on “bottle-to-bottle” markets, short supply plus process improvements and technical advances in reclamation equipment have stimulated recyclers to make significant increases in thermoform recycling in recent years. On average, PET reclaimers in the US accept thermoforms at levels up to 10-15% with baled bottles for processing into a variety of end-use markets. More recently, markets for postconsumer PET thermoform-only material have emerged, with multiple buyers on the west coast seeking PET thermoform-only bales, including supplies from Ridwell in Portland. With more consumer education around PET thermoform recyclability and a deliberate push to include in curbside bins, the potential recovery increase is even greater. Total annual generation of PET thermoforms available for recycling in the US is estimated at 1.8 billion pounds.

Thermoform to thermoform recycling. We are also encouraged that several producers of PET thermoform packages have introduced new specifications requiring postconsumer PET thermoform content in their packages. Data from our recent 2020 PET Thermoform Market Analysis yielded a total of

14.5 million pounds of post-consumer thermoform recycled PET used by the sheet and thermoform community in 2020.

NAPCOR is a non-profit trade association representing the polyethylene terephthalate (PET) plastic packaging industry. PET is the most recycled plastic and identified by the number 1 resin identification code. Common applications using PET material include beverage bottles, thermoforms, cups and trays. Our membership encompasses the PET supply chain, including raw material suppliers, container producers, PET reclaimers and equipment suppliers.

Thank you for the opportunity to provide input on this important decision and please feel free to ask additional questions.



Best regards,



Darrel Collier
Executive Director NAPCOR
Phone: (704) 241-1631 | Email: dcollier@napcor.com