

**FY 2023 NEW YORK STATE EXECUTIVE BUDGET, ENVIRONMENTAL CONSERVATION****TITLE 33 EXTENDED PRODUCER RESPONSIBILITY ACT****February 1, 2022**

Hon. Liz Krueger  
Chair New York State Senate Finance Committee  
416 Capitol  
Albany, NY 12247

Hon. Helene E. Weinstein  
Chair New York State Assembly Ways and Means Committee  
LOB 923  
Albany, NY 12248

**Dear Chairperson Krueger and Chairperson Weinstein and Members of the Joint Budget Committee,**

Plastic Energy Limited is a technology provider at the forefront of the circular economy for plastics and the advanced recycling industry. Over the past 10 years, using patented technology, Plastic Energy is converting end of life mixed plastic waste to produce virgin-quality recycled plastic. Plastic Energy has over 5 years of operational experience in Spain with two commercial plants in Almeria and Seville. As the company looks to grow in the USA, it is important that EPR legislation supports the development of advanced recycling. This in turn will enable the highest recycling rates for plastic packaging while at the same time ensuring that high-quality, food-grade recycled content is incorporated into plastic packaging.

*Below arguments are made in support of point 6 page 174 and points 7 and 8 page 176 of Title 33 Extended Producer Responsibility Act*

**Why should EPR scheme include advanced recycling? How is advanced recycling supporting this goal?**

Advanced recycling enables the treatment of a broad range of plastic waste ensuring mixed post-consumer plastic packaging will be recycled. Recycled content produced via advanced recycling is comparable to virgin quality and therefore suitable for food-grade packaging. Advanced recycling will enable larger quantities of superior recycled content to be put on the market and will facilitate the highest recycled content availability.

**EPR is crucial for supporting the goal above and the opportunity offered by advanced recycling**

An EPR scheme is key to support the wider collection of plastic packaging and create opportunities for better sortation and reuse. Dedicated budget allocation for wider collection and specialized sorting for both mechanical and advanced recycling is crucial to enable the highest quality sorting and to maximize recycling volumes to produce high-quality, food-grade recycled content. EPR will allow more

access to plastic waste streams and will support the development and expansion of recycling via both mechanical and advanced recycling technologies.

Plastic Energy believes it is very important for the New York State Senate to support the development of an EPR scheme and to encourage innovation and technologies like advanced recycling to grow. Advanced recycling technologies have multiple environmental benefits when used to complement existing approaches to reduce, reuse and mechanically recycle plastic waste. Some of the key benefits advanced recycling offers are listed below.

### **Advanced recycling increases recycling rates and provides high-quality recycled content**

Advanced recycling is a complementary technology to mechanical recycling with the ability to recycle mixed plastic waste streams which are currently difficult to recycle via mechanical technologies. For example, Plastic Energy's plants in Spain process end of life plastic waste such as flexible and film packaging, including multilayer packaging that would instead be incinerated or landfilled. Multiple polymer types can be mixed together and the residual plastic waste from material recovery facilities that is today sent to landfill can also be used by advanced recyclers with some additional sortation. Hence advanced recycling can increase recycling rates and divert plastic waste from landfills and incineration.

Plastic Energy has focused specifically on plastics to plastics production. All the output manufactured from the advanced recycling plants in Spain is used to make prime application plastics such as food grade packaging. Products that are already being made with output from our advanced recycling plants include Mangum Ice Cream, Philadelphia Cream Cheese, Yoplait Yogurt, and many more.

### **Advanced recycling has a lower CO<sub>2</sub> footprint for recycling end of life plastic waste compared to incineration and a lower footprint for producing LDPE when compared to LDPE manufactured from virgin fossil sources.**

Plastic Energy published a fully peer reviewed, ISO 14040/14044 compliant Life Cycle Assessment (LCA). The LCA study looked at both the end of life and product manufacture scenarios. When end of life plastic is used in advanced recycling vs. incineration, on a per kg of waste plastic basis, the CO<sub>2</sub> impact for the former option is lower by roughly 65%. In addition to the carbon footprint, advanced recycling is done in the absence of oxygen, so no combustion occurs. When 1 kg of LDPE is made from oil from Plastic Energy advanced recycling vs. oil from virgin fossil sources, the CO<sub>2</sub> impact for the former is lower by roughly 50%.

In conclusion, Plastic Energy kindly and respectfully urges the New York State Senate to encourage the development of and include the technology of advanced recycling as part of the EPR scheme.

Sincerely,

**Adela Putinelu** | Head of Policy  
[adela.putinelu@plasticenergy.com](mailto:adela.putinelu@plasticenergy.com)



**Plastic Energy Limited**  
65 Carter Lane  
London  
EC4V 5DY  
(+44) 7904 066 889  
[plasticenergy.com](http://plasticenergy.com)