



June 29, 2022

The Honorable Paul Tonko
Chairman
Environment & Climate Change Subcommittee
U.S. House of Representatives
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable David McKinley
Ranking Member
Environment & Climate Change Subcommittee
U.S. House of Representatives
2125 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Tonko and Ranking Member McKinley:

Thank you for holding the hearing, “No Time to Waste: Solutions for America’s Broken Recycling System.” In conjunction with this hearing, the American Cleaning Institute® (ACI)¹ would like to offer our perspective as Congress examines ways to improve America’s recycling capabilities.

ACI recognizes the need to mitigate the impacts associated with the creation, use, and disposal of our product packaging. Cleaning product packaging is designed to protect the health and safety of consumers and their families, while also ensuring safe transport, storage and use of cleaning products during all stages of a product’s lifecycle.

The optimization of ACI member company product packaging is a priority to deliver the performance of the products ACI members produce. It is for this reason that we have established guiding principles that help us ensure our products, which provide hygiene and cleanliness, do so in a manner that is environmentally sound, socially responsible and economically viable without compromising the ability of future generations to meet their needs. Our members have collaborated on guidelines to help direct design and manufacturing, and to aid in the development and use of recyclable packaging. We have also charted a roadmap aiming to achieve 100 percent collection and reuse, recycling or composting of cleaning product packaging waste by 2040.²

It is important for future generations and the health of our planet that we minimize post-consumer waste. As the world continues to move to a more circular economy, ACI believes there are steps that policymakers can take to improve our recycling systems and encourage the adoption of more sustainable practices. These include:

Increasing availability of post-consumer recycled plastics

ACI members have ambitious packaging goals that have created a demand for material that currently surpasses supply. We support policies that expand access to recycling, modernize recycling technologies, and create cleaner streams of material.

¹ ACI represents the \$60 billion U.S. cleaning product supply chain. ACI members include the manufacturers and formulators of soaps, detergents, and general cleaning products used in household, commercial, industrial and institutional settings; companies that supply ingredients and finished packaging for these products; and chemical distributors. ACI serves the growth and innovation of the U.S. cleaning products industry by advancing the health and quality of life of people and protecting our planet. ACI achieves this through a continuous commitment to sound science and being a credible voice for the cleaning products industry.

² https://media.acihq.org/gsp/gs/mediaobjects/docs/Sustainability/ACI_circularpackaging.pdf

Reducing single-use plastics

We recognize that the most effective way to be a responsible steward of the environment is to reduce our dependence on virgin materials and natural resources. ACI seeks to achieve this through the optimization of product packaging (e.g., right-sizing and utilizing concentrated products) and investing in reusable and refillable packaging formats.

Data collection

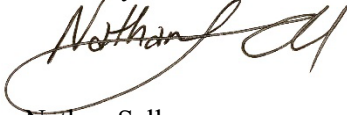
An important component of implementing any policy is measuring key performance indicators. For our nation to embark on a journey to improve our recycling performance, we must understand what is being recycled and where it is being recycled to understand our needs and measure our progress moving forward.

Consumer Education

The success of America's recycling accomplishments depends on a vast number of stakeholders who are each valuable participants in the recycling value chain. However, a significant amount of our success will depend on consumers who are equipped with information about what they can recycle, the benefits of recycling, and where to recycle to ensure that the recycling stream is clean and materials can maintain their circularity.

ACI remains committed to working with Congress on finding recycling solutions that evolve and advance our nation's materials reclamation systems. We appreciate the subcommittee holding this hearing to examine the issue and look forward to continuing our dialogue in the future.

Sincerely,

A handwritten signature in dark ink, appearing to read "Nathan Sell", with a stylized flourish at the end.

Nathan Sell
Senior Director, Sustainability