

## Nadeau, Jessica

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**From:** Clark, Thomas <thomas.clark@advansix.com>  
**Sent:** Tuesday, January 24, 2023 3:00 PM  
**To:** Maine Packaging EPR  
**Cc:** Clark, Thomas  
**Subject:** Benefits of Post-Industrial Recycled

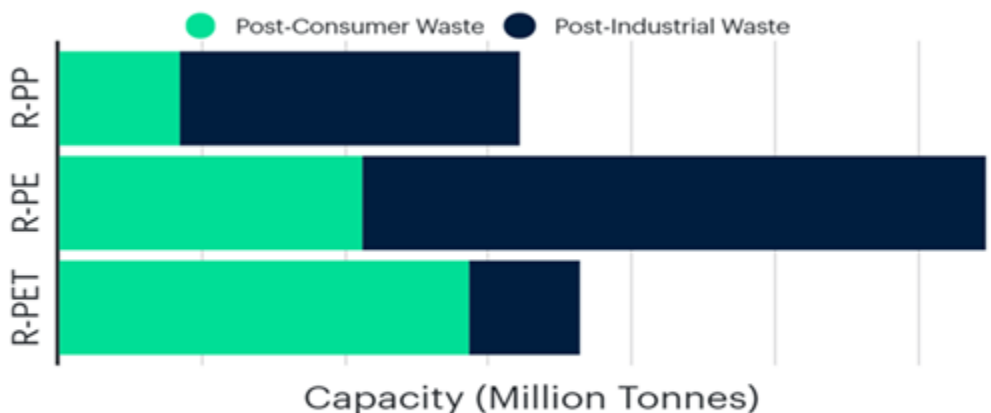
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As a follow-up to my question during Maine's second EPR Stakeholder meeting. I would encourage the specific inclusion of post-industrial (a.k.a. pre-consumer) recycled content in the subsequent guidance language to help Maine meet end-goals of reducing landfill and improving the carbon footprint of packaging. To that point, I wanted to share some information concerning the benefits that PIR (post-industrial recycled) content can provide. Dr. Laura Thompson from GreenBlue has published an opinion article, highlighting the [benefits of including PIR](#) in the circular economy.

- PIR is defined as "recycled content" by both the FTC ([Green Guides, Section X](#)) and international standards ([ISO 14021 7.8.1.1](#))
- PIR currently makes up the majority of recycled content used in the US currently (*see graph below*)
- There is a lack of clean, consistent recycled supply to meet demand, with that gap expected to continue in the foreseeable future. Brand owners are not able to meet their recycled content goals (*see graph below*)
- Since the quality and consistency of PIR is generally better than PCR, it enables a higher recycled content in the resulting package...particularly for food packaging
- Just like post-consumer (e.g., PET soda bottles), post-industrial materials are recycled when economics are favorable and there is an environmental benefit
- PIR can provide an Improved carbon footprint vs virgin resin

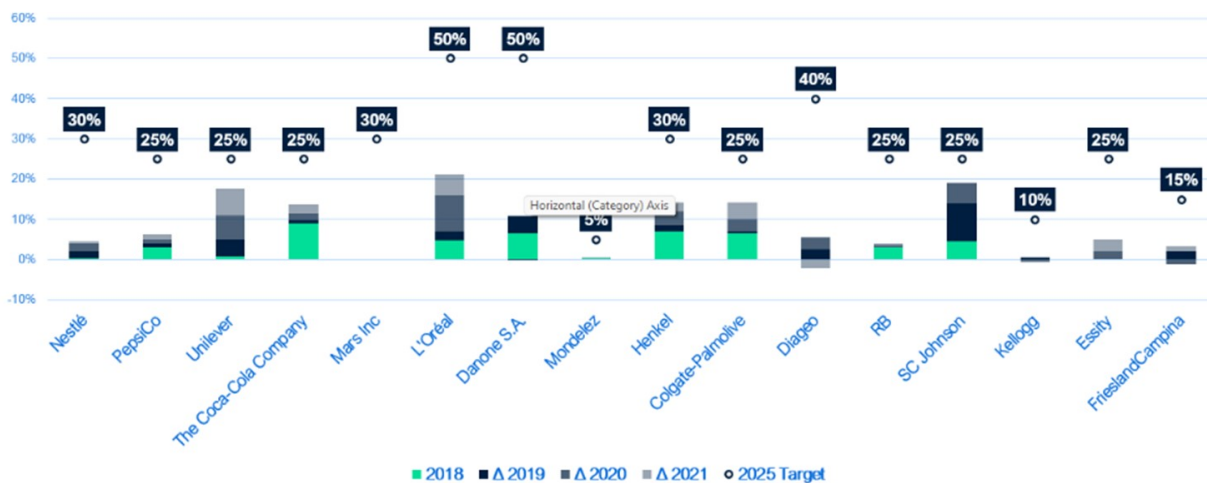
# US Mechanical Plastic Recycling Capacities



Source: ICIS, Recycling Supply Tracker – Mechanical, 2021

Majority of US recyclers utilize post-industrial PE feedstocks rather than post-consumer material (ICIS Recycling Supply Tracker, 2/2022)

## THE GLOBAL COMMITMENT: 2022 PROGRESS



Sources: Ellen MacArthur Global Commitment 2019, 2020, 2021 and 2022 Progress Reports, edited by ICIS for this presentation

I would be happy to address any questions you may have.

Kind regards,  
Tom

**Thomas Clark, Ph.D.**

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