



**New York State Legislature  
Assembly and Senate Standing Committees on Environmental Conservation  
Public Hearing on New York State Recycling Issues  
October 21, 2019**

**Comments from  
International Bottled Water Association  
and  
Northeast Bottled Water Association**

Assembly Chair Englebright, Senate Chair Kaminsky and members of the Assembly and Senate Standing Committees on Environmental Conservation, the International Bottled Water Association (IBWA)<sup>1</sup> and the Northeast Bottled Water Association (NEBWA)<sup>2</sup> appreciate this opportunity to provide comments for your joint hearing on recycling and recycling markets in New York. The bottled water industry is proud of the significant work we have taken over the years to produce products that are 100% recyclable, lightweight our bottles to use less plastic, support and work closely with groups focused on educating consumers about recycling, and continue to reduce the environmental footprint of our industry.

**IBWA is a Strong Supporter of Recycling**

IBWA believes that increasing the recycling rates for all consumer products and packaging should be a top priority. Recycling plays a critical role in reducing waste, reusing valuable packaging materials, and helping to develop new, comprehensive solutions to managing solid waste throughout the U.S. The following principles should apply to any recycling effort:

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<sup>1</sup> The International Bottled Water Association is the trade association representing all segments of the bottled water industry, including spring, artesian, mineral, sparkling, well, groundwater and purified bottled waters. IBWA's mission is to serve the members and the public, by championing bottled water as an important choice for healthy hydration and lifestyle, and promoting an environmentally responsible and sustainable industry. IBWA represents bottled water bottlers, distributors and suppliers throughout the United States, including several small, medium and large size companies doing business in New York.

<sup>2</sup> The Northeast Bottled Water Association is a non-profit trade association whose members are connected with the bottled water industry in some way. Member companies include those engaged in the bottling, packaging, delivery or distribution of bottled water as well as those engaged in equipment, supplies and services for the industry. Geographically, NEBWA members are from throughout the Northeast - New England, New York and New Jersey. NEBWA members are kept updated on the state legislatures, learn industry details through seminars taught by trained educators in the field, meet with others who may be able to offer solutions to business problems and stay in contact with present and potential customers.

1. Minimize Environmental Footprint - Recycling programs should collect recyclables in a manner that minimizes the environmental footprint and does not create inefficient energy or natural resource use.
2. Comprehensive and cost efficient - Recycling programs should seek to collect recyclables in a cost-effective manner and provide the maximum opportunity, through ease of participation in multiple venues, for consumers to recycle a broad range of products and packaging.
3. Sustainable Funding - Responsibility for the cost burden of any recycling program should be shared by both industry and government (municipalities for curbside and state government for other programs). Recycling program funds should be dedicated solely for the use of supporting recycling efforts.
4. Achievability - Recycling program(s) should have reasonable and specific recycling rates goals (e.g., X % increase in rate over Y years, X % of households covered within Y years, etc.), and these goals should be measured and evaluated on a regular basis.
5. Consumer Involvement - Recycling programs should include components that educate and motivate consumers to purchase products that are recyclable and recycle those products after use.

IBWA approaches packaging and recycling issues in a manner that emphasizes using the most effective and efficient solutions to reduce the strain on the environment, while considering the shared responsibility of all stakeholders, including consumers. IBWA believes that locally run, comprehensive recycling programs are the best method of cost-effectively diverting solid waste from landfills and increasing recycling of consumer products and packaging.

### **New York's Bottle Bill**

Bottled water has been part of the New York bottle deposit law for exactly 10 years (bottled water was added to the existing program on October 22, 2009). But as technology advances and the demand for recycled materials increases, New York has been struggling to increase its redemption numbers compared to other states that have deposit programs.

Earlier this year, IBWA members spent a day in Albany meeting with key legislative leaders and staff, regulatory and departmental staff, and even the Governor's office, to open discussions on issues with the existing deposit program, what other states are doing to keep up with a rapidly changing environment, and offer ideas on how to help both the state and manufacturers benefit from simple changes. We urge the legislature to consider an in-depth review of how some changes to the bottle deposit program can better prepare it for the future prior to considering expanding the bottle bill to new products.

IBWA and NEBWA members who operate and sell in New York look forward to continuing these conversations with a goal of improving the state's bottle bill and ensuring its long-term viability and sustainability. We welcome the opportunity to meet with any office to further address improvements to the bottle bill that will help all New Yorkers.

## **Bottle Water is an Excellent Environmental Steward**

The bottled water industry has long been concerned about the environment and engaged in reducing its footprint. All bottled water containers are 100% recyclable, and we support strong community recycling initiatives as we recognize that a continued focus on increased recycling is important for everyone. In addition, PET bottled water containers are the most common item in curbside recycling programs. They make up 54.6 percent of the PET plastic collected in curbside programs. However, even when they are not properly recycled, bottled water containers make up only 3.3 percent of all drink packaging in U.S. landfills.

Continual light-weighting of PET plastic packaging has seen the average weight drop to 9.25 grams per 16.9 ounce single-serve container. According to the Beverage Marketing Corporation, between 2000 and 2014, the average weight of a 16.9-ounce (half-liter) PET plastic bottled water container declined 51 percent. This resulted in a savings of 6.2 billion pounds of PET resin.

While bottled water is just one of thousands of consumer items packaged in plastic, the bottled water industry has also gone to great lengths to reduce the environmental impact of its packaging, including developing new technologies in product packaging such as the use of recycled content, reduction of plastic used in caps and shrink-wrapping, and reduction of paper used in labels and shipping cardboard. IBWA member companies are increasing their use of recycled plastic, including recycled polyethylene terephthalate (rPET), and many bottled water companies already use bottles made from 50, 75, and, in some cases, 100 percent rPET. Furthermore, the bottled water industry is continually developing additional ways to reduce its environmental footprint from production to distribution to consumption.

## **The Bottled Water Industry in New York**

Companies in New York that manufacture, distribute and sell bottled water employ as many as 12,560 people in the state and generate an additional 22,113 jobs in supplier and ancillary industries. These include jobs in companies supplying goods and services to manufacturers, distributors and retailers, as well as those that depend on sales to workers in the bottled water industry. The jobs currently generated by the bottled water industry in New York are good jobs, paying an average of \$69,843 in wages and benefits.

Not only does the manufacture and sale of bottled water create good jobs in New York, but the industry also contributes to the economy as a whole. In fact, the bottled water industry is responsible for as much as \$8.86 billion in total economic activity in the state. Furthermore, the industry generates sizable tax revenues. In New York, the industry and its employees pay over \$574.0 million in taxes including property, income, and sales-based levies.

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We thank you for this opportunity to provide these comments and the bottled water industry stands poised to work with New York to address the various important issues regarding recycling and recycling markets in the state. We look forward to learning more about efforts being proposed in New York and working with you as we collectively seek to minimize waste and increase recycling rates to strengthen circular economies for plastic packaging.

Sincerely,

James P. Toner, Jr.  
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International Bottled Water Association

Jillian Olsen  
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Northeast Bottled Water Association