



May 19, 2011

Dear Editor,

As Executive Director for NAPCOR, the trade organization for PET packaging in the United States and Canada, I feel it imperative to comment on recent articles pertaining to the NURRC reclamation plant in Spartanburg, SC, specifically the April 25, 2011 update of "Coke's Vitters: Plant Will Resume Food-Grade Operations by Summer" article (*Plastics News*, <http://www.plasticsnews.com/headlines2.html?id=11042500103&q+=Vitters>).

For many involved or interested in the recycling industry – including users of food contact RPET and the general public – the article sowed uncertainty. Specifically, the statement made by Coke's Scott Vitters, "The issue is not so much what's in the bale, but the contamination in the PET material itself," is misleading in its implications about the viability of food and beverage grade recycled PET produced in the US and Canada from curbside, deposit, and drop-off material.

While certainly not the intention behind the coverage of the NURRC story, misperceptions potentially jeopardize the extraordinary investments made in the PET reclamation industry. NAPCOR estimates that over the last two years alone, these investments have exceeded \$300 million, much of which has been focused on increasing and improving bottle-to-bottle material capacity. Some additional facts:

- In 2009, over 203 million pounds of RPET was used back into PET bottles; almost half of this was produced from curbside bottles.
- This material was produced by at least eight North American reclamation plants that have received Letter of Non-Objection (LNO) status from the FDA, allowing them to produce direct food / beverage contact recycled PET material.
- In addition to these eight plants, two plants manufacture LNO RPET specifically for direct food contact in PET thermoform packaging.
- The NURRC plant is not the world's largest bottle-to-bottle plant, nor will it be if or when it's completed this summer, according to available information; it is a minor contributor to the 203 million pounds mentioned above.
- Bale quality, as it relates to yield, continues to be an issue, but is not a recent occurrence. We at NAPCOR agree that bale quality is a major cost and technical impediment and is something that needs to be addressed nationwide; it is something that reclaimers have been dealing with for a long time. Bale quality should not be confused with the quality of the virgin or recycled PET used to manufacture PET packaging.

- Encouraging brand owners and package designers to adhere to Design for Recyclability is unquestionably an essential component of maintaining a high-quality recycling stream. We find it disconcerting that Mr. Vitters makes mention of this since a number of major issues confronting PET reclaimers today are a result of bottles used to package Coke products. NAPCOR fully supports the Association of Postconsumer Plastic Recycler's (APR) ongoing development of Design for Recycling guidelines and test protocols for PET (bottles and thermoforms) and HDPE, and urges Coke to do so as well.

We understand that the specifics of the NURRC situation were reported as experienced and interpreted by the immediate players, but the NURRC experience is not indicative of the PET reclamation industry at large. The intent of my letter is to emphasize that the food and beverage grade recycled PET infrastructure in the United States and Canada is robust and limited only by adequate supply of recycled PET containers.

Sincerely,



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