

0:0:42.440 --> 0:4:32.730

Andrejko, Judith [DEP]

All right, Christina, let's go with the next slide.

Hello and Welcome. I'm Judith Andrejko, the regulatory officer for the Contaminated Site Remediation and Redevelopment Program. I'd like to welcome you to the NJDEP stakeholder meeting for New Jersey's recycled content law. This is the second so far in a series, I'm going to be the facilitator for today. We ask that you keep your mic muted through the presentations and we ask that you only use the chat function if you are experiencing technical issues or if the name that is displayed for you on your sign in is not who you are. In other words, if you're Joe Jones, but you're actually Jerry Jones from ABCD company, we would ask that you please put your name and affiliation in the chat box so that we can actually have an updated and precise roll call. For those of you who are attending. Next slide.

I just want to go over some of the in-house rules, friendly reminder we've been through all this since the start of COVID, again, please put your information in the chat box for who you are. If you have dialed into this meeting, please e-mail us at recycledcontent@dep.nj.gov because we are unable to identify the names of dialed in attendees and we want to make sure we know that you're here. Next slide.

Also, when we come to the functions in teams, we ask that you use the chat function for technical difficulties only because we have our DEP staff on hand that would hopefully be able to help you with any technological problems that you might have in hearing or seeing today's presentations. We ask that you use the raise your hand function which is up at the top of your ribbon. Please use that if you have a comment or question. After the presenter concludes the presentation, I'll be selecting people to speak based upon when their hands were raised. When you are selected to speak, we ask that you unmute your microphone and proceed with your question or comment. After you're done speaking, we would ask that you then once again mute your mic and lower your hand. In the interest of time there may be a DEP staff member who may interject in the discussion with the cue to keep us on schedule. Today's schedule runs us from 1:00 until 4:00 o'clock, so we have 3 hours to play with and talk about a lot of recycled content information. We are looking forward to today's presentations. We may have that staff member interject and wrap up the discussion so we can move on to our next topic in the presentation so that we're able to get through our line of topics for today. Next slide.

Alright, I'd like to introduce our rulemaking team for today: from the Bureau of Solid Waste Planning and Licensing. We have Chris Mikulewicz, Seth Hackman, Jill Aspinwall, Dylan O'Brien, Nell Henry; from the Bureau of Sustainability, we have Robin Heston Murphy. And today, we also have Sonya Silcox from the Division of Waste Underground Storage Tank, Compliance and Enforcement. At this point in time, I'd like to toss to Chris Mikulewicz who's going to be our host for today, going through the presentations and hopefully fielding most of the answers to your questions. Take it away, Chris.

0:4:33.510 --> 0:7:54.50

Mikulewicz, Christopher [DEP]

All right. Thanks so much, Judy. Christina, you can advance to the next slide, please. We have three goals for today's rulemaking meeting. We are going to be discussing the calculation methodology for recycled content and covered products as well as discussing recycled content certification report requirements, all with the goal of obtaining your input and feedback for rulemaking and program development. All right, Christina can move to the next slide please.

Here is the agenda for today's meeting. As mentioned, the discussion topics are recycled content calculations and compliance certification report requirements. We will be going through an overview of the statutory requirements for each of the discussion topics, leading to a discussion portion for each topic. Discussions will consist of a list of questions that we have for you, the regulated community and interested parties, to as mentioned gain feedback

for the overall rulemaking process and we'll end with the conclusion to the meeting as well. So with that, Christina can move to the next slide please.

So as stated, we'll be starting with an overview of the statutory language related to calculating recycled content for covered products. The following slides were taken directly from section two of the Recycled Content Law. Next slide please. From the law, a manufacturer shall achieve compliance based on the average amount of recycled content utilized in each covered product, which is defined as either a rigid plastic container, a plastic beverage container, a glass container, a paper or plastic carryout bag, or a plastic trash bag. Manufacturers will be required to submit data based on the average weight of recycled materials using covered products or by other metrics as determined appropriate by the department. Next slide please.

For calculating recycled content data, manufacturers may utilize either state specific or national data to calculate the average amount of recycled content contained in each covered product category. If using national data, the manufacturer must demonstrate that state specific data is not feasible to generate, and furthermore, the calculation may be based on entire product lines or broken down by product sub lines as long as all covered products are accounted for in the calculations. Next slide please. For manufacturers utilizing national data for their calculations, they must prorate their data based on New Jersey's market share or population to ensure calculations accurately reflect recycled content utilized for covered products sold or offered for sale in New Jersey. Next slide please. We're going to get right into it with that overview. Let's move into our first discussion topic for recycled content methodology or recycled content calculation methodology. Next slide please.

Our first question we have for you today is 'What data and information is already collected regarding recycled content utilization?' We're looking for how manufacturers currently track recycled content utilization across the product portfolio, across brands and so forth to really understand what is going on internally within the manufacturers own tracking purposes and process. I'll open it up. Please raise your hand if you would like to add any feedback or input for this question.

0:8:0.370 --> 0:8:3.810

Andrejko, Judith [DEP]

OK, we're going to start with Ben Gavett. Good afternoon, Ben.

0:8:4.690 --> 0:8:57.630

Ben Gavett

Good afternoon. So, you know California has their RPPC Requirement so for national manufacturers that distribute nationally, they already have in place requirements to meet the minimum RPPC content so in terms of being able to retrieve the data, if you're selling them both jurisdictions, it's not really a big deal. What would be great is if the requirements were identical because you know you as a manufacturer, you know one strategy to compliance is comply with the most stringent in hopes that it covers everybody.

0:8:59.230 --> 0:9:22.480

Mikulewicz, Christopher [DEP]

Got it. Thank you for your input. We are trying - we are in conversations with California and Washington state as well to try to make sure the programs align as best as possible and see where we can harmonize with other states. Of course, we are limited to what is in New Jersey statute, but like I said, we will be trying to harmonize with other states with their requirements where feasible.

0:9:25.150 --> 0:9:26.590

Andrejko, Judith [DEP]

Alright, but do you have anything further?

0:9:31.30 --> 0:9:31.580

Ben Gavett

I'm good.

0:9:31.960 --> 0:9:43.180

Andrejko, Judith [DEP]

OK, thank you. Anyone else? OK, we might want to move on to the second question.

0:9:43.380 --> 0:10:28.0

Mikulewicz, Christopher [DEP]

All right, sounds good. So next question being 'How is post-consumer recycled content calculated and tracked across products? Is there a standard format or methodology utilized for the industry and is recycled content measured in pounds or other units that the department isn't aware of or is it usually a weight?' I'm really looking into how your recycled content is, is tracked, measured and overall reported. So with that, I'll open it up to the floor. Please raise your hand if you would like to add any input to this question or have any comments. Exactly.

0:10:20.680 --> 0:11:9.850

Andrejko, Judith [DEP]

Because this is something that we don't usually do, but we're going to have to do because of statutory requirements, we'd like to know what type of systems you have in effect now because as these statutory obligations come up, we'd like to make it as seamless as possible and as much of an easy lift. Because if there's, if you're already tracking this information in some way with whether it's some type of software or some type of approach, if we can basically shoehorn into that kind of structure and have it cross the entire spectrum so that that's really not a heavy lift for a lot of people, that would be our goal in this to make it as user-friendly for the regulated community as we can. Let's see. We have Clarence Rasquinha. Good afternoon.

0:11:10.710 --> 0:12:22.940

Clarence Rasquinha

Yes, good afternoon. So the way we would do it, our engineers would, for a given package, we will record the total gram weight and it's typically in gram weight, we would work with our suppliers, and in our specs, we would determine first of all can we use recycled content depending on the product we may not be able to, but once we can use it, we work with the supplier to document in our contracts etcetera that for a certain category of products we're going to expect X percentage of recycled content. And it's typically a range in our experience, it's not always exact and this is also a bit of an art, particularly when it comes to a gigantic screws and extruders for plastic bottles for example. It's not a perfect, it's a range. We documented range by percentage and it's and we have the total gram weight and so therefore we can strongly estimate the recycled content based on gram weight as a percentage of the total weight.

0:12:24.890 --> 0:13:1.870

Mikulewicz, Christopher [DEP]

Got it. That that's very helpful. A follow up question to that. Do your suppliers obtain or provide documentation regarding how they procured recycled content or is it just written to the contract and it's expected to be followed as such?

0:12:41.30 --> 0:13:11.730

Clarence Rasquinha

Yes, and to be a perfectly candid there are obviously exceptions in the sense based on availability of materials and such you know I mean we are also trying to produce product and get it out the door and we do not necessarily want to hold up production because PCR may not be available. So there are escape valves but yes by contract they basically say so many pounds of resin or PCR's put in and that's how we document it.

0:13:12.520 --> 0:13:24.780

Mikulewicz, Christopher [DEP]

Got it. That's very helpful that and the gram component as well, we weren't sure exactly how recycled content is measured initially before being put into covered products. So that is very helpful. Judy, Do you have anything else to add?

0:13:25.670 --> 0:13:40.180

Andrejko, Judith [DEP]

No, Clarence, thank you very much for the info. We really appreciate it. Do we have any other hands? Mary Ellen Peppard had her hand up I and she put it back down. I don't know if you have anything to add to the point.

0:13:40.690 --> 0:14:51.460

Mary Ellen Peppard

I thought then maybe I thought I jumped the gun of the questions a little early. So it's I don't have the very specific information like some of the other the other folks do it's more of a perhaps a clarification and the way a lot of our members are- so they have their brands so they're the, you know, the larger manufacturer and they have many brands under them and so a lot of their tracking and reporting currently would be aggregated across say like different product categories as opposed to individual brand by brand and so I think that would be but well, preferable way to of doing it. And I'm not -I was looking for some clarification on is that what the Department is having in mind in terms of how for that for that average calculation, would what that would look like, can it be aggregated across the product categories say plastic beverage containers or is it? You know per individual brand OK so.

0:14:45.340 --> 0:15:12.400

Mikulewicz, Christopher [DEP]

Right. and that you will get to that that conversation a little bit further into the presentation, but I think you're on the right track and we have we have had conversations and then this is and for that reason we put those some similar questions into this presentation. So that we really understand what the manufacturer capable of doing. So please add more when you get to that part of the presentation but thank you for noting that because it is really helpful for us in understanding how to address that in the rules.

0:15:12.850 --> 0:15:13.680

Mary Ellen Peppard

Thank you so much.

0:15:14.30 --> 0:15:14.540

Mikulewicz, Christopher [DEP]

Thank you.

0:15:14.120 --> 0:15:18.560

Andrejko, Judith [DEP]

Thanks, Mary Ellen. Next up, we have Doug Sheffield. Hi, Doug. How are you?

0:15:19.440 --> 0:15:40.520

Sheffield, Doug

All right. How are you? We're in the can liner trash backspace and so our recycle content, right, our bill of material for items is a percent of different products, but we would we measure that in pounds, so not much.

0:15:40.980 --> 0:15:51.530

Mikulewicz, Christopher [DEP]

Got it. So it's not necessarily standardized across the industry, it's based on however the contracts are written kind of how the information is provided in the 1st place, is that correct?

0:15:51.800 --> 0:16:9.120

Sheffield, Doug

Yeah. So like when you know when we're producing, when we're producing a case of bags, that case of weigh 20 pounds and you know 10% of it will be PCR, 80% will be some other virgin resin and so on so.

0:16:10.50 --> 0:16:38.300

Mikulewicz, Christopher [DEP]

Got it. And how is that virgin versus recycled content conveyed to you? Is that 2 separate documentations or are they in in the form of receipts or they put together in one balance sheet. Can you just elaborate a little more on how version versus recycle content is conveyed?

0:16:28.110 --> 0:16:48.690

Sheffield, Doug

Yeah, well, so we have the inputs in our ERP system, the inputs are set up as different items. So we track down -- we can tell exactly how many pounds of each product we consumed in any given period.

0:16:49.660 --> 0:16:59.190

Mikulewicz, Christopher [DEP]

OK. That's very good to know. Thank you. Judy, you're muted.

0:17:0.750 --> 0:17:8.10

Andrejko, Judith [DEP]

Good grief, I keep hitting the wrong button. Next up, we have Jody Mason. Hi, Jody. How are you today?

0:17:6.80 --> 0:17:49.370

MASON Jody

Hi, good. How are you doing? Thanks for holding hosting this this forum. I have a question about reporting standards. We do mass balance aggregation like Mary Ellen mentioned across our portfolio. The issue that we're running into right now is that some of our portfolio follows across different business unit entities. And so while we would be able to, you know to meet the mandate across our portfolio, the way that we have to report would kind of split up that. Those business units, those business entities to report separately. And so I just wanted to raise that concern here because that is something that's sort of a bit of a challenge for us.

0:17:50.320 --> 0:17:55.970

Mikulewicz, Christopher [DEP]

OK, that's good to know. Can you elaborate a little bit more on the business units or business entities that would?

0:17:54.960 --> 0:18:21.300

MASON Jody

Yeah. They have separate tax identification numbers. And so that's how we're required to report in New Jersey. So I just wanted to raise that because if there was a way that we could combine those unit, those business entities, even though they have maybe separate tax entities for business purposes, but it's the same company, it's the world we own all of them, that's when they wanted to raise here, because that would certainly be beneficial for us.

0:18:21.730 --> 0:18:31.540

Mikulewicz, Christopher [DEP]

That is good to know. Thank you. That really helps. Do you have any other anything to add or any further comments? I don't see any hands raised right now.

0:18:31.930 --> 0:18:34.230

Andrejko, Judith [DEP]

No further hands. I think we're ready for the next question.

0:18:34.770 --> 0:19:33.500

Mikulewicz, Christopher [DEP]

Alright, sounds good. So we're trying with this next question to see how glass versus paper versus glass differs when calculating recycled content. I'm sure they have different markets and they might have different ways of conveying recycled content. So we're trying to see how, if at all they differ between how they're calculated for recycled content for products that utilize plastic or glass or paper. So folks from other industries can chime in and see if they can. That elaborate on the distinction between the three materials that would be very helpful for determining how each material or each covered product might require different calculations if need be. And the answer to this question could very well be it doesn't differ it it's the same it's just the matter of the material. But we're just trying to make sure that there aren't any distinct, any, any distinctions between the three if there aren't any, or vice versa if there are.

0:19:34.750 --> 0:19:54.70

Andrejko, Judith [DEP]

Now I just have a question from because I normally don't deal with this, but when you're dealing with plastic versus glass versus paper just for paper is the paper always dry? Is there a measurement of the different weights of the paper? I'm just thinking from a laymen's perspective there's a lot of different variables when you're dealing with paper versus glass. Like glass you have your different types of cullet, you'd have your different colors, that type of thing but I didn't know if – is there a weight issue that comes in or is it all dry is there any point of reference that's also measured for any particular type of material?

0:20:23.230 --> 0:20:47.100

Mikulewicz, Christopher [DEP]

Exactly and that's what we want to try to get a better understanding of with this question to see how the different markets and the different industries convey recycled materials, calculate recycled materials, anything like that. So like I said, if there are no, there are no differences, we can proceed with that. But we want to propose this question just to get ahead of any differentiations between the three.

0:20:47.620 --> 0:20:50.830

Andrejko, Judith [DEP]

We actually have a hand from Paul Harvey. Hi, Paul. How are you?

0:20:51.760 --> 0:22:21.170

Paul Harvey

Good, good to be back again. I just was, you know thinking about, you know the topic that we're talking about, you know, in terms of the different sheets, you know, your corrugated and your, you know regular papers and whatnot. I do know that there are different markets obviously for each of them, I'm pretty involved in least personally in my county's recycling program. And so I do know that they have several different they, they supply several different outlets in terms of you know recycled materials. You know paper, can metals, plastics, you know, corrugated cardboard, etcetera. So you know I can put you in touch with my county recycling agency. Maybe you can talk with them and maybe see you know what the different markets are to go ahead and see how they calculate that. You know, obviously you know or I don't know what the recycling program is in New Jersey, but you may want to talk to you with your municipal recycling handlers, you know to see and the people who they dropped their suppliers off with to see how that's calculated because you know normally it all depends on the on the local recycling, well the actual recycling program in terms of you know, do they just kind of shift everything all together, paper and cardboard all together or do they what all the different types of plastics do they just crush them up and send them all separately?

0:22:22.10 --> 0:22:58.380

Paul Harvey

You know, I don't know if you're talking county boards recycling or recycling agencies, but yeah, I would definitely reach out to them trying to figure out what the best way to [see] how it processes further down the line.

0:22:39.740 --> 0:22:58.660

Mikulewicz, Christopher [DEP]

Right. That's a good point. We were. We weren't sure if the if the calculations differ between the materials or but you're kind of saying that it's it might be on how the material ship once collected and that I don't think we had. We had initially looked at it through that lens. So that's a good point to raise with us. So thank you for that really help. That's really helpful as well.

0:23:0.90 --> 0:23:5.380

Andrejko, Judith [DEP]

All right. Thanks, Paul. Clarence has a little more to add. How are you again?

0:23:6.30 --> 0:25:11.340

Clarence Rasquinha

Yes. I think we spoke briefly about plastic earlier where depending on structure and base resin etcetera. It's typically at least we typically documented based on percentage recycled content and then recording grams. However, paper, there are many, many options. OK, so really if you're talking about fiber, I mean like the previous gentleman just raised corrugated that is a category in and of itself. There's paper board which is, you know, for example, cereal boxes and of course there's just general use paper that you can put in your copier machine for example so. So within that depending on the mills that produce. For example, paperboard is you can quite commonly, you know, find everything from virgin paperboard all the way to clay coded news back that's might have about 35%. In general it's a it's a very good standard regardless of which mill you buy it from. So, so paperboard for example you can go anything from 100% Virgin to something that might have at least 35% or more of recycled content in it. OK. And they have mills that certify that. Now when it comes to corrugated, it's again by design. You could probably have 33-34% and there are some mills that are 100% recycled content. However, corrugated is a lot more challenging because availability of recycled content again to put into getting a performance box may - is sketchy. It can be available, and sometimes it's low and in times when it's not available you might get 100% virgin corrugated box. So typically even the even the largest mills they no one will. No one will say we have exactly this much PCR content in a box.

0:25:10.450 --> 0:25:12.760

Andrejko, Judith [DEP]

Is there a season for them like -- *(speaker interrupted)*

0:25:12.480 --> 0:26:16.400

Clarence Rasquinha

It's not seasons based on availability and you know it's directly correlates to how well we recycle in this country. It's one of the best recycled materials but yet it's not a very good number to be despite recycling across the country. So having said that corrugated. You know, is a fiber material and just depending, you know, on production and demand it. Most likely will have some recycled content, but you know it all most big corrugate supplies will probably comment and say we put this many metric tons in our annual year into the boxes we sent to your particular company. However they won't comment and say we know exactly how much is in a specific box on a specific month in a specific day that came to us. So it just depends. It's much more challenging to get an exact number but that's recorded again percentage it's percent by weight. OK so.

0:26:15.620 --> 0:26:16.760

Mikulewicz, Christopher [DEP]

And by weight, OK.

0:26:38.480 --> 0:26:39.70

Clarence Rasquinha

Correct.

0:26:17.440 --> 0:26:58.200

Mikulewicz, Christopher [DEP]

That's good to know and what? And also it might also differ not, maybe not by the material type but within the material itself depending on what the covered product could be. That's also something I've picked up as well from your comment. So it's also very good to know we were trying to figure out if there's a differentiation between the three, but it could also differ well within just one material. So we'll have to figure out the at also have to be addressed in the rules as well to make sure the only paper product covered under the laws paper Carry out bags, so I have to make sure that we are specific to that type of paper when discussing or clarifying this calculation for this in the rules.

0:26:58.800 --> 0:26:59.0

Clarence Rasquinha

Yep.

0:26:59.540 --> 0:27:1.270

Mikulewicz, Christopher [DEP]

Thank you. That's very helpful.

0:27:1.950 --> 0:27:5.310

Andrejko, Judith [DEP]

Thanks very much. Next up, we have Dennis Hart. Hi, Dennis. How are you?

0:27:10.20 --> 0:27:48.520

Dennis Hart

Good afternoon, everyone. I wanted to and thank you for doing this is very helpful and we all appreciate this. I have a question in in growing out of our discussions about advanced recycling and it's about mass balance and how has the department thought about including mass balance in the calculations of recycled content and are you considering what other places use where you have third party certifiers that are able to certify the recycled content?

0:27:41.790 --> 0:27:54.620

Mikulewicz, Christopher [DEP]

So you might be jumping the gun a little bit here because that is we have a question on that I think in two maybe three slides. So feel free to come back up and ask that question or provide some insight when we get there. But yeah, we will be touching upon that a little bit more later on.

0:27:53.810 --> 0:27:56.930

Dennis Hart

Right. I know there's other people that want to talk about that. Sorry. Thank you.

0:27:57.10 --> 0:27:58.560

Mikulewicz, Christopher [DEP]

Yeah, no worries. Thank you. We appreciate it.

0:28:0.900 --> 0:28:3.590

Andrejko, Judith [DEP]

Thanks. Next up we have Dave Westerhoff.

0:28:5.510 --> 0:29:5.780

Westerhof, Dave

Hi I represent a large food manufacturer and what we bottom line, you're talking about making it easy or convenient. We spent a lot of time reporting every year to Ellen MacArthur and also Walmart and some of the different retailers. And so whether there's different materials, we all end up in pounds, because we're trying to compare. Right. We're looking at our usage on 100% basis of how much of its plastic, how much of its paper, how much steel, how much glass. So we may engineer down to the gram. And work with our suppliers and our suppliers will provide us a certificate of compliance to [what] our specification is. But ultimately we use our volume that we produced and we multiply that out and convert it into pounds so that we can compare all the materials that the end of the day so.

0:29:6.890 --> 0:29:32.280

Mikulewicz, Christopher [DEP]

That that's very good, would you mind if you have on hand to send that or provide it through the recycled content e-mail box to send that calculation or that conversion factor? We would be interested in seeing how to expand it beyond just using pounds for to make to make it easier for manufacturer that may not use pounds for their standard measurement. So providing that conversion factor might be useful for other purposes as well.

0:29:33.490 --> 0:29:34.970

Westerhof, Dave

Right.

0:29:34.640 --> 0:29:35.160

Mikulewicz, Christopher [DEP]

Thank you.

0:29:36.880 --> 0:29:40.410

Andrejko, Judith [DEP]

Alright, thanks so much. Next up, we have Doug Sheffield.

0:29:43.950 --> 0:30:34.10

Sheffield, Doug

Yep, I'm back. So I just wanted to, follow up so the person that was talking about the paper. Plastic in our world, particularly the can liner world is the same the variety of recycled material that we get in the I mean the quality will differ pretty drastically from time to time and load to load so. You know, we look at it and deal with it on a like he was saying, we'll say over a period of time the product will have say a 10% level across the board.

0:30:34.960 --> 0:30:55.0

Sheffield, Doug

But it's very difficult to say any individual bag or any individual case has a specific percent because. You get some PCR in that runs great. We make and get 15-20%. Some of it is dirty. We can only get 5 at any given time so.

0:30:53.970 --> 0:31:2.780

Mikulewicz, Christopher [DEP]

So that that's why that's why it's helpful to have that average because it's it, it's also a factor of the quality of material that we're receiving as well.

0:31:2.500 --> 0:31:6.860

Sheffield, Doug

Quality and availability of the material at any given time.

0:31:7.380 --> 0:31:9.190

Mikulewicz, Christopher [DEP]

Got it. That is helpful. Thank you.

0:31:10.890 --> 0:31:16.320

Andrejko, Judith [DEP]

All right. Thanks, Doug. Next we have John Catalano.

How are you, John?

0:31:18.360 --> 0:32:22.830

John Caturano -Nestle NA

I'm good. Thank you very much for having a session today. You know, I wanted to make a maybe a recommendation that there are great trade associations out there that could be helpful in these discussions and they often represent a lot of a lot of the brands and some of the constituencies here. The question I had and you might get to this in some of the leader slides and excuse the background noise please. The so Nestle has a virgin reduction goal for plastics and we are always looking at emerging technologies. You can call it chemical, molecular or advanced recycling. It's got a few different names. Will those methodologies be deemed viable in the, in the content reductions or content mandate and they you do use a certification called ICC, will those be suitable. For meeting some of the standards and goals, because that would definitely open up the possibilities and the playing field and those materials do come from plastic streams that are not recycled today. So that could be an accretive solution.

0:32:23.190 --> 0:32:48.600

Mikulewicz, Christopher [DEP]

Right, right. I, and Judy, you can [correct] me if I'm wrong here, but I think that Bill is still going through our state's legislature right now, so it's unclear right now in what we will be able to do in regards to recycle advanced recycling in this law. So it's still more so a factor of what the position that the legislature will take at this point. Judy, have anything else to add to that point?

0:32:48.970 --> 0:32:49.540

Andrejko, Judith [DEP]

Nope.

0:32:50.700 --> 0:32:51.350

John Caturano -Nestle NA

OK.

0:32:50.70 --> 0:32:51.910

Dennis Hart

Could I just add one thing to that point?

0:32:52.800 --> 0:32:53.220

Mikulewicz, Christopher [DEP]

Yes.

0:32:54.560 --> 0:32:54.860

Andrejko, Judith [DEP]

Yes

0:32:52.910 --> 0:33:11.360

Dennis Hart

It's Dennis Hart. I just want to bring up even if that Advanced Recycling Law doesn't make it in New Jersey. we're still going to have advanced recycling materials being produced around the country that are going to be shipped into the state. So you, you're going to have to figure this out either way.

0:33:12.900 --> 0:33:19.940

Mikulewicz, Christopher [DEP]

Yeah, that that is a that is a good point, I think.

0:33:16.350 --> 0:33:20.890

Andrejko, Judith [DEP]

At this point, the answer is no until we have a law that would let us do it.

0:33:25.870 --> 0:33:26.840

John Caturano -Nestle NA

OK. And the other the -- (*speaker interrupted*)

0:33:27.690 --> 0:33:48.500

Mikulewicz, Christopher [DEP]

I'm no sense that we're having separate conversations on advanced recycling to get a better understanding as to the overall technological ability of that of the technology. So that is more so a conversation that we're going to have separately from this law we are watching as closely as we can, but how it's going to be addressed in this law remains to be known.

0:33:50.470 --> 0:33:50.880

John Caturano -Nestle NA

Thank you.

0:33:51.520 --> 0:33:52.330

Mikulewicz, Christopher [DEP]

Of course. Thank you.

0:33:52.880 --> 0:34:11.120

Andrejko, Judith [DEP]

Let's see. Paul, Dave and John, you still have your hands up, but I think we've taken care of your issues with this question so far. Chris, we don't have anything new for this one. So we might want to move on.

0:34:11.910 --> 0:34:47.420

Mikulewicz, Christopher [DEP]

Well, we have one question left on this slide that I would like to get to and it could be a quick question hopefully. So how can the weather hear from the regulated community interested parties about how the Department can further clarify how to calculate recycled content, whether that be through maybe a calculation formula? I know California for their RPPC program has that we're not sure if that if manufacturers have found that helpful. So if there's anything you'd like to share with the Department so we can get a better understanding of how to clarify how to calculate recycle content in the rules? How would be helpful here?

0:34:49.210 --> 0:34:52.570

Andrejko, Judith [DEP]

We have a hand from Taryn O'Connor. Hi, Taryn. How are you?

0:34:55.320 --> 0:35:37.440

Taryn OConnor

Sorry, OK. I'm unmuted now. Hi, I raised my hand a bit late and I also sadly arrived a little bit late, so please let me know if this question has already been answered and I can relook at the transcript. But my one question is I know

that in terms of calculating the contents of the of your containers, what if you have like, do you take the overall average of the recycled content in all of your containers? So like if we have one container that has no PCR but like is like 75% PCR in another one, do we take the average of all of our containers?

0:35:38.210 --> 0:35:41.420

Mikulewicz, Christopher [DEP]

Yes.

0:35:39.60 --> 0:35:41.690

Taryn OConnor

OK, great. Thank you. That's it.

0:35:42.370 --> 0:35:42.900

Mikulewicz, Christopher [DEP]

Of course. Thank you.

0:35:43.190 --> 0:35:46.950

Andrejko, Judith [DEP]

Alright, thanks for your question. Next we have Robert Lock. Hi, Robert.

0:35:48.0 --> 0:36:9.790

Lock, Robert

Hi everyone. The I know you said you were coordinating with the folks in Washington and California, but I think the formula that Washington put out was particularly helpful to determine an average based on national. Sales things like that. So now that was helpful for us.

0:36:10.380 --> 0:36:11.790

Mikulewicz, Christopher [DEP]

Ok. That's good to know. Thank you.

0:36:13.250 --> 0:36:22.20

Andrejko, Judith [DEP]

Alright, thank you much. Next up, we have Ally Peck. Hi, Ally.

0:36:20.870 --> 0:36:43.550

Ally Peck

Sorry, I was on mute. I would say, yeah, more information is always better, especially I think for my membership. And I would also just like to say that we would support any kind of harmonization with other States and I get a lot of specific questions, so. More information, formulas I think that would be helpful to everyone.

0:36:44.480 --> 0:36:46.510

Mikulewicz, Christopher [DEP]

All right. That is good to know. Thank you.

0:36:47.230 --> 0:36:47.660

Ally Peck

Thank you.

0:36:47.260 --> 0:36:54.420

Andrejko, Judith [DEP]

Thank you much. And I think that's all the hands for the slide.

0:36:54.980 --> 0:37:32.470

Mikulewicz, Christopher [DEP]

Alright, let's move on to our next slide, Christina. So we have a blurb from the statute of available at the top of your screen. We're looking to get a better understanding of regarding the specific terms product subline and product line to better understand what the legislature intended and what current operations for industry looks like. So let's start with the first question. What do you consider a product sub line to be and how does that relate to recycled content calculations, if at all?

0:37:35.810 --> 0:37:43.670

Andrejko, Judith [DEP]

OK, first up we have Robert Lock. Robert, I don't know if you have a question about this or if you are a holdover from the last one. But the floor is yours.

0:37:46.100 --> 0:37:50.890

Lock, Robert

Thanks. No, I always forget this about teams that you have to unclick your hand raise. So ignore me.

0:37:51.290 --> 0:37:52.260

Mikulewicz, Christopher [DEP]

No worries. Thank you.

0:38:4.970 --> 0:38:5.340

Andrejko, Judith [DEP]

OK.

0:38:4.690 --> 0:38:21.420

Mikulewicz, Christopher [DEP]

Do the manufacturers believe they will use product sublines at all in their calculations or are you mostly most likely going to use the covered product categories defined as rigid plastic containers, plastic beverage containers, and so forth?

0:38:22.120 --> 0:38:23.430

Andrejko, Judith [DEP]

We have Ally Peck.

0:38:27.260 --> 0:38:57.180

Ally Peck

Sorry. Hi again. I would say if we don't have to get down to product like, the more specific we get on sublines and sub sublines, the more difficult the reporting's going to be and I would say for our packaging doesn't necessarily substantially always differ. So I think more flexibility here is something we would be in favor of if possible.

0:38:57.740 --> 0:38:59.20

Mikulewicz, Christopher [DEP]

OK, that's good to know.

0:38:58.380 --> 0:39:0.260

Andrejko, Judith [DEP]

So picking it up at the product line.

0:39:2.500 --> 0:39:3.10

Andrejko, Judith [DEP]

OK.

0:39:1.450 --> 0:39:15.90

Ally Peck

Exactly. Yeah. I represent the Consumer Technology Association. So think of it in terms of like versions of laptops or versions of cell phones like.

0:39:18.100 --> 0:39:24.770

Mikulewicz, Christopher [DEP]

Right. Right.

0:39:15.800 --> 0:39:26.230

Ally Peck

It would get very specific and you would get a lot of information that could just be more averaged and aggregated that would help. Yeah, so.

0:39:26.180 --> 0:39:48.230

Mikulewicz, Christopher [DEP]

That's very good to know. Yeah, we weren't exactly sure what the legislature meant when they mentioned products sublines, and we weren't sure that to an industry specific term or if that was something that was just thrown in as to mean something else. So we were trying to get a better understanding as to what the industry or how the industry interprets that that term. So thank you. That's really helpful for us as well.

0:39:49.250 --> 0:39:53.220

Andrejko, Judith [DEP]

Next up. Is Mary Ellen Peppard. Hi again.

0:39:54.800 --> 0:40:15.380

Mary Ellen Peppard

Hi again and thank you so much for doing this. I think I would sort of largely echo what Ally said. First off, in terms of that, sure, the less complex and difficult it is for our members to calculate and the ability to aggregate across brands, I think is very helpful - one of the questions my members was getting is well what's a product subline they're not sure what the legislature meant by that - we're not sure what the legislature meant by that.

0:40:27.260 --> 0:40:27.750

Andrejko, Judith [DEP]

Yep.

0:40:32.870 --> 0:40:33.150

Mikulewicz, Christopher [DEP]

Mm-hmm. We are in the same boat with that one.

0:40:27.810 --> 0:41:3.0

Mary Ellen Peppard

So I think you, I think if you know if it's possible to aggregate across those covered categories, we would certainly think appreciate that flexibility. One of the questions we had received a lot during the registration piece, which I think again is goes to this question in terms of sub line is you know are we talking about for example different sizes you know if you have five different sizes of a particular brand of ketchup and so. I think that's where some of the confusion least from my membership stems from.

0:41:3.440 --> 0:41:17.990

Mikulewicz, Christopher [DEP]

Right. And I think that's I think that's kind of where we were, how we were interpreting it and we weren't sure

what the benefits of us of providing the product subline if the brand itself was already captured. So that's one of the purposes behind this question as well.

0:41:18.870 --> 0:41:20.50

Mary Ellen Peppard
Perfect. Thank you.

0:41:20.340 --> 0:41:20.830

Mikulewicz, Christopher [DEP]
Thank you.

0:41:21.160 --> 0:41:25.950

Andrejko, Judith [DEP]
Thank you much.

0:41:22.450 --> 0:41:49.500

Mikulewicz, Christopher [DEP]

So I guess we can move on to the next question being some examples of product lines that may exist in the marketplace. So would like a product line be something like the specific brand and all of the products within that brand or is it a product with, is it just one product within under a manufacturer and then parsed out between all of the product lines within that brand, if that makes sense and trying to?

0:41:49.280 --> 0:42:29.450

Andrejko, Judith [DEP]

OK, from a from a layman's perspective, let me see if I can get there. We because I've been to like my local BJ's or Costco and you see the picnic setup, which has your - say it's Heinz, you have your Heinz ketchup, your Heinz mustard, your Heinz relish. Now they're all Heinz, and they're all kind of in the same container, but are they - would the ketchup versus mustard be a subline issue because they're kind of condiments? Or is ketchup, ketchup and mustard's mustard?

0:42:25.560 --> 0:43:16.850

Mikulewicz, Christopher [DEP]

Yeah, that's a great. That's a great analogy. Thank you. I was trying to, I was trying to think of one off the top of my head and I just it wasn't coming so I was trying to be as general as possible, but yeah. So the as you can see in the blurb above, the calculation of averages maybe based on a manufacturer's entire product line or separate into product sublines. So we're trying to figure out exactly how those two terms differ so that we can make sure that the calculations coming in accurately reflect what the manufacturer sell between their product lines, product sublines and the Heinz being ketchup, relish mustard and so forth are those individual product lines, or would those be considered product sublines cause that will be a factor into how the compliance certification reports will require information from the manufacturers.

0:43:17.340 --> 0:43:52.980

Andrejko, Judith [DEP]

And it's like I I'm thinking about there's that as an example but then there's also like Tide. You have your Tide liquid, you have your Tide flings, you have your Tide scent beads, you have your Tide dryer sheets just like whether it's Gain or Downey or whatever would those different types of products under that same name be considered as subline? Or we we're not sure if there's a type of specification that's actually used as a as a standard in the industry.

0:43:53.540 --> 0:43:54.40

Mikulewicz, Christopher [DEP]

Exactly.

0:43:54.160 --> 0:43:55.590

Andrejko, Judith [DEP]

We have a hand from Ally Peck.

0:43:58.950 --> 0:44:48.530

Ally Peck

Yeah, I don't have a specific answer for you. I was just going to say I think it differs across industries and because this is for all packaging of – more or less packaging of all products, I think it's going to be difficult to get into specific sub lines so again I would be in favor of more flexibility and you know products in general as in like a laptop versus phone instead of like this specific laptop with this kind of Intel with this kind of definition or like you know like TV's or like 1080 you can have different kinds of specs within the tv's and that would just not be necessary. You wouldn't get a lot out of us dividing it up by sub, you know, like deep into the sublines.

0:44:48.670 --> 0:44:56.340

Andrejko, Judith [DEP]

So instead of like say you have a notebook versus a laptop, they could be all laptops and then you have a separate category which would be your tablets.

0:44:56.880 --> 0:44:58.520

Ally Peck

Exactly. Yeah, we would.

0:44:57.160 --> 0:44:58.550

Andrejko, Judith [DEP]

Which would be like the single.

0:44:59.210 --> 0:45:26.590

Ally Peck

Yeah. We would be in favor of more simplified reporting and that scope again, you know if specific manufacturers have it broken down by the kind of laptop, then maybe they will choose to submit it that way. But I think. Requiring it to be done by sublines you're going to get a lot of information that isn't necessarily comparable across different industries.

0:45:27.10 --> 0:45:48.700

Andrejko, Judith [DEP]

Is this something that's being done already or is like the sub line concept something new and independent of this particular statute? We didn't know if it's actually happening in the marketplace, that's another thing that we're looking into. Yeah.

0:45:45.300 --> 0:45:49.730

Ally Peck

If manufacturers are reporting based on Sublines, I don't have answer on that.

0:45:52.130 --> 0:45:57.50

Ally Peck

So unfortunately I can't help you there. I can get back to you so.

0:45:56.420 --> 0:46:2.120

Andrejko, Judith [DEP]

I see a couple more hands that are being raised too, so. Let's check.

0:46:0.580 --> 0:46:4.380

Ally Peck

Great. You could move on to that. Thank you.

0:46:3.490 --> 0:46:8.120

Andrejko, Judith [DEP]

Alright, thanks so much. Ally, next is John Catalano. Welcome back.

0:46:10.750 --> 0:46:29.410

John Caturano -Nestle NA

Again, I you know, I don't. I don't disagree with making it simplistic and I don't know anything about laptops and how we how PCR works at app. But from a beverage perspective, we use something called a BOM, it's a bill of material and that's an SAP and that gives us very finite detail of what particular -- (*speaker interrupted*)

0:46:28.570 --> 0:46:32.480

Andrejko, Judith [DEP]

What's an SAP? I'm sorry. OK.

0:46:30.370 --> 0:47:22.550

John Caturano -Nestle NA

It's a sales engine and how we sell our products, right? It's a platform. You know, it's very specific and you could have you could have a company like Nestle that might want to promote in a premium product PCR for consumers. So in some of these, I I'm sure I'm not speaking for everyone here. I'm as a matter of fact, I'm pretty positive I'm not, but when you get to you know data, it can be very specific even. It's just the way it is. It's not that we went out of our way to make it that way. It's just the way it is in the system. So I think in some cases you can extract really specific detail and information. If I look at California, for example, we do report the percentage over an aggregate of what's subject to the content requirements, but we have the detail down to that level because it's in the bill of material. So we'll see it.

0:47:23.170 --> 0:47:24.180

Mikulewicz, Christopher [DEP]

Got it. OK.

0:47:23.800 --> 0:47:26.730

John Caturano -Nestle NA

Just one, just one example for you to ponder, that's all.

0:47:27.660 --> 0:48:1.580

Mikulewicz, Christopher [DEP]

And that's good to know because just because some manufacturers might be capable of producing that information doesn't necessarily mean that everyone's going to be able to do it. So we would want to make sure that we are addressing everyone's concerns and making sure that the requirements are achievable for everyone, not just those few, but maybe having something along the lines of optional data that manufacturers can provide. Maybe we can get some more information and get that more thorough data or more specific data than compared to requiring it and not being able to get something that's useful for us.

0:48:2.600 --> 0:48:17.420

John Caturano -Nestle NA

Yeah, it is a very, very heightened sense of importance on claims. Generally speaking in packaging. So the data is very important and the specificity of the data is extremely important because when you make a claim.

0:48:22.880 --> 0:48:23.230

Mikulewicz, Christopher [DEP]

Right.

0:48:18.620 --> 0:48:24.430

John Caturano -Nestle NA

It's got to be pretty. It's got to be pretty sound from a legal perspective, and I'm sure that makes sense to everybody.

0:48:24.670 --> 0:48:26.530

Mikulewicz, Christopher [DEP]

Yeah, that definitely does. Thank you.

0:48:27.50 --> 0:48:30.900

Andrejko, Judith [DEP]

Alright, John, thank you so much. Next we have Paul Harvey. Hi Paul.

0:48:34.20 --> 0:49:56.240

Paul Harvey

Hello I'm just I'm just kind of thinking at least from a practical perspective at least when it comes to this. You know, when I look at you know, a grocery shelf and I'm just going to go ahead and use, you know, butter, for example. You know, when I look at a Land O Lakes packaging for the unsalted butter versus the salted butter. I don't necessarily. You know, unless there's a visible, you know, shape differential, you know. And we're talking in terms of waste here. There's really not much in terms of difference in terms of actual waste, you know, projected, OK, it's still the same rectangular box with the inside wrapping up with the with the four sticks of butter inside the wrapping. You know, so again, I'm kind of just thinking of this from a practical perspective and this is that, you know, if you have all of this subline data. You know, it would definitely be a I don't want to say it be unnecessary, but I'm just saying that, like, again, the difference between the unsalted butter and the salted butter, like there's no difference because the same shape that has the same wrapping, the same amount of butter in it. So and the four sticks. So the question then becomes is it, are we just doing the reporting just to do the reporting, you know what I'm saying.

And.

0:49:54.10 --> 0:49:58.410

Mikulewicz, Christopher [DEP]

Right. Yeah, that that's a great point. I mean, if it's just because something's -- *(speaker interrupted)*

0:49:58.30 --> 0:50:3.950

Paul Harvey

And like I said, I'm not advocating one way. Yeah, I'm just more or less thinking about this from a practical perspective. And.

0:50:0.490 --> 0:50:8.810

Mikulewicz, Christopher [DEP]

Right from the practical standpoint, yeah, I mean, just because something is as market it's differently doesn't necessarily mean it's package differently. That's a good point.

0:50:9.470 --> 0:51:7.870

Paul Harvey

Right. So I mean it's and the other thing too is that, you know, there may be proprietary information involved you know in terms of the actual packaging which I mean being involved in the food industry. I mean we all have worked very little secrets you know further down the line so. You, you know, for whatever reason I mean, sometimes, you

know, at least, you know, for me personally, you know, I like a particular brand of yogurt because of the way that it's designed and the way that it fits my lifestyle. You know, so that leads to a company they could claim that that is through their market research, whatever they could go ahead and claim. That's pretty proprietary information. So again, just kind of thinking of more of a practical concern, just not advocate anything specific, but just kind of thinking about other things that kind of go into.

0:51:9.660 --> 0:51:10.10

Mikulewicz, Christopher [DEP]

Right.

0:51:8.290 --> 0:51:17.920

Paul Harvey

Product design, you know you know the same 16 ounces that you know a tall just say for example like again.

0:51:27.850 --> 0:51:28.180

Mikulewicz, Christopher [DEP]

Right.

0:51:18.380 --> 0:52:3.30

Paul Harvey

you know a 16-ounce yogurt or however much an 8-ounce yogurt. Yoplait yogurt. OK, you know, you know, you'll play yogurts are tall and skinny. OK is the same ways the same as an 8 ounce contains the same 8 oz as an 8-ounce Chobani yogurt. Now the question then becomes, OK, what is the actual amount of You know what is the actual surface area of, you know that particular product? And that is obviously that's a design pattern. That's a design specifically to a company. That's a brand that is a qualifying feature. So you know, I like I said, I'm not a lawyer. I'm not a patent lawyer, but I don't know, maybe this is something to go ahead and look into.

0:52:3.390 --> 0:52:29.850

Mikulewicz, Christopher [DEP]

Yeah, that definitely. And there are, there is a proprietary information provision in the in, in the law that you know, restricts the department from releasing that information. So to address any of those concerns, there is something in the law that would hopefully remedy some of those concerns. And we also are going to touch upon proprietary information a little bit later in the in this presentation as well. So thank you Paul that was really helpful.

0:52:31.120 --> 0:52:33.390

Andrejko, Judith [DEP]

Thanks very much. Next up, we have Jody Mason.

0:52:34.620 --> 0:53:6.730

MASON Jody

Again, I agree with what Paul just stated as well as allies. Concerns around simplicity. No, we are not seeing sublines being asked for in other states. What we're asked to report is total volume of covered material sold in the state and what the percentage of PCR is in that total volume. So that's the more simplistic way to look at it and it's so it would be total PCR for plastic, total PCR we're selling in glass, total PCR for paper. So under a covered material as the total volume with the percentage of PCR.

0:53:7.650 --> 0:53:16.280

Mikulewicz, Christopher [DEP]

OK, that's good to know as well. Yeah, we'll definitely want to keep it as simple as possible. So definitely noted that through the feedback received so far. So thank you.

0:53:16.250 --> 0:53:19.610

Andrejko, Judith [DEP]

Sounds good. Next up, Ray Cantor. Hi, Ray. How you doing?

0:53:20.240 --> 0:54:37.860

Ray Cantor

Doing well, I wasn't playing to speak because I really don't know the topic as well as many of your commentators today. But I'm just struck at the complexity of what you're trying to do, so I don't envy your task. I think I'm you know, you're looking to regulate or you're dealing with manufacturers from across the world and every product sold, you know, on every shelf. So I would just suggest that you know we not lose sight of the goal, which is to increase the amount of recycled content. So I would, you know maybe echo what I think other commentators are saying and keep it as simplistic and as flexible as possible. Let's not gather information that isn't going to be used that is not going to have relevance, you know, at the end of the day, you may not be perfect in every calculation and every reporting data point what's important is that we achieve the goals of the legislation of increasing recycling recycled content. So again you know as a layperson who's being blown away from the details being given to you guys I'm just arguing for simplicity and flexibility.

0:54:38.890 --> 0:54:41.20

Mikulewicz, Christopher [DEP]

Thank you very much. Appreciate your comment.

0:54:39.780 --> 0:54:42.100

Andrejko, Judith [DEP]

Duly noted. Thanks, Ray.

0:54:42.820 --> 0:54:43.260

Mikulewicz, Christopher [DEP]

Thank you.

0:54:44.300 --> 0:55:33.180

Mikulewicz, Christopher [DEP]

Let's move on to our next. I think we spent a good amount of time on this topic. So let's move on to our next slide. We have another question similar to the last, more so on calculating state vs. national data calculations. So again the blurb from the statute is included at the top of your screen. And are we trying to get at what do whether manufacturers intend to provide national, regional or state specific data so that way we can better prepare for those compliance certification reports to come in. As well as just understanding what industry is capable of doing when providing data to us. Judy you're muted if you're –

0:55:30.330 --> 0:55:38.900

Andrejko, Judith [DEP]

I just wanted to give it another maybe 10 seconds for hands to come up. New ones. We have a Clarence welcome back.

0:55:40.500 --> 0:56:18.400

Clarence Rasquinha

So I would argue for national data, then prorated towards the population in New Jersey only because that is perhaps the most conservative way to go about it versus state specific is very difficult anymore given ecommerce and all the other challenges on how product is procured by citizens in the state of New Jersey. And so it would you know it would be much more favorable for based on national Sales versus and then and then drilling it down to pop, you know, based on the population in New Jersey.

0:56:22.620 --> 0:56:52.310

Mikulewicz, Christopher [DEP]

Right, right. Yeah. And that's the statute completely allows for that. We're just trying to get a better understanding or just to better prepare ourselves for what will be incoming to us so to understand what manufacturers are intending to provide to us come compliance, certification reports when they're due 2025 I believe. So thank you. That's really helpful. So it sounds like a lot of the manufacturers will be steering to national data just for again simplicity ease of compliance. Do we have any more hands on this question?

0:56:51.870 --> 0:56:54.250

Andrejko, Judith [DEP]

All right. Yep. We have two, Ally Peck.

0:56:56.190 --> 0:57:20.800

Ally Peck

I was going to say that manufacturers sometimes have trouble knowing exactly where everything can be sold because the retailers can control a lot of the distributions and we can't necessarily tell the retailers what states to sell our products in. So that's just, you know, keep that in mind when thinking about this is, is the retailers control.

0:57:20.540 --> 0:57:44.690

Mikulewicz, Christopher [DEP]

That. Yeah, that's very good to know. I mean, the, the, the statute itself, for the most part exempts most retailers from these requirements. So they're they are a piece to this puzzle and we make sure that we keep them in mind as well when, you know, addressing supply chains and how cover products move throughout the throughout the country. So thank you. That's good to know.

0:57:39.110 --> 0:57:45.460

Ally Peck

Yeah, we can't, like, tell, Best Buy, sell our laptops here instead of here and they get to decide.

0:57:45.750 --> 0:57:46.580

Mikulewicz, Christopher [DEP]

Right. Thank you.

0:57:47.790 --> 0:57:48.140

Andrejko, Judith [DEP]

All right.

0:57:47.540 --> 0:57:53.100

Mikulewicz, Christopher [DEP]

So follow up question to that. We do? I'm sorry, I'm sorry.

0:57:49.980 --> 0:57:58.610

Andrejko, Judith [DEP]

Like we have one where we still have one more. Yeah. Dying. Diane put her hand down. So. Look.

0:57:57.0 --> 0:57:58.620

Dianne M Brickman

Oh yeah, just because I knew you were picking on me.

0:58:1.0 --> 0:58:6.610

Andrejko, Judith [DEP]

Do you want to add?

0:58:4.720 --> 0:59:16.850

Dianne M Brickman

Yeah. I just wanted to add real quick just to kind of support what they were saying, Diane Brickman from Sherwin-Williams. So there's Pros and cons to the reporting for producers into a state narrows down the information because we can only report what we actually sell directly into the state. Because when we're selling to distributors, you know, in, in that state, they may sell it out of the state or we're selling to distributors out of the state, they may sell into the state and we won't be capturing that information. But if we report national data, if you require us to report all weights that sold. Nationally, that's a big report, and that's a lot of, you know, that's like, I don't know if every company can handle that all in one report. So that would be an aggregation of many, many other reports to get that data. But if we can give percentages, so we would get information from our packaging suppliers and they would tell us what the PCR content is by percent. And we could give that in percentages, much easier than saying out everything we sold last year in nationally, it's this much weight. That's a much harder thing to give.

0:59:17.230 --> 0:59:28.580

Mikulewicz, Christopher [DEP]

Right, but in that percentage, just a follow-up question in that percentage that they provide, is that percentage by weight or by volume or that specified and it's just a flat percentage?

0:59:28.590 --> 0:59:30.780

Dianne M Brickman

Yeah, it is by weight in grams.

0:59:31.90 --> 0:59:33.510

Mikulewicz, Christopher [DEP]

OK, that's in grams. OK, that's good to know as well.

0:59:35.780 --> 0:59:38.140

Andrejko, Judith [DEP]

Thanks, Diane.

0:59:34.650 --> 1:0:18.220

Mikulewicz, Christopher [DEP]

Alright, thank you very much. It's very much appreciated. So next question on this slide, the requirements of this law require manufacturers to indicate to the department whether a national data is not feasible to generate. So to effectuate this part of the law, we want to know what documentation can be provided to demonstrate state specific data is not available or feasible to generate. So with that we just want to understand if there is any type of documentation. Or if it should be something as simple as a certification that a state specific data is not a feasible to generate. So just a few comments on this would be very helpful for us to figure out how to address this in the rules.

1:0:28.860 --> 1:0:37.820

Andrejko, Judith [DEP]

Well, we're not hearing from everybody. So that's making me think that we're headed toward a certification of some sort. Oh, Mary Ellen. Welcome back.

1:0:40.10 --> 1:1:12.190

Mary Ellen Peppard

Thank you so much. I think certainly a simple as possible certification would certainly be appreciated. I mean the members have had said from the beginning of these discussions a couple years back before this was even law they didn't. They didn't see how they would really be able to parse out the information for specific states. That's just not how it works with the national and global brands and so. I'm not aware that there be any sort of documentation that would be.

1:1:14.710 --> 1:1:15.110

Mikulewicz, Christopher [DEP]

OK.

1:1:13.120 --> 1:1:24.50

Mary Ellen Peppard

That's they currently exist to that in that regard. So thank you so much.

1:1:15.990 --> 1:2:14.370

Mikulewicz, Christopher [DEP]

Yeah, exactly. We weren't sure if it did exist or if it's like, like I said, as simple as it doesn't, it doesn't exist. So let's just sort of apply to that. So thank you. That's really helpful. All right. I think we're good to move on up. See any other hands on this? Alright. Christina, can you move to the next slide? This is a pretty quick question as well.

Again, a blurb from the statute is at the top of your screen. Manufacturers are required to average the amount of post-consumer recycled content by weight or another metric. We would like to know if there are other metrics out there aside from weight that would like that you would like to be included in the rules or regulations as another way to calculate recycle content and if it is as simple as it should be by weight then then we can leave it as being move on. But we just want to allow this opportunity for manufacturers and the regulated community to chime in and say if you prefer another. Another metric of some form.

1:2:17.880 --> 1:2:18.760

Andrejko, Judith [DEP]

Diane Brickman.

1:2:21.250 --> 1:2:46.0

Dianne M Brickman

So this is sort of related but not 100%. So we get questions from our suppliers on if they can use post industrial recycled content. Instead of or in. In conjunction with Postconsumer, because the postconsumer recycled content isn't always available, would that be allowed as into the totally recycled content or no?

1:2:47.170 --> 1:3:1.740

Mikulewicz, Christopher [DEP]

By the definition of post consumer recycled content, it specifically excludes post industrial material, so they would not be. It would not be able to be included in the calculations for a covered products when certifying to the standards and the law.

1:3:3.280 --> 1:3:15.30

Dianne M Brickman

And then one other question, since I have you. Since like a FIFRA and Heatherton products are not covered, are they still supposed to be in the report and just exempt or just not reported at all?

1:3:21.860 --> 1:4:6.400

Mikulewicz, Christopher [DEP]

The certification requirements will require the exemption to be like cited or provided in some form, but it would not have to be calculated in the in the calculation for certifying to a certain standard. All we would need to know is that these products meet an exemption and cite specific exemption that it meets in the from the law. And I would only need to be done one time. As for the duration of any applicable exemption or unless the intended use or the products packaging changes at some point. But for the most part, we're going to keep that part as simple as possible, citing to that one specific exemption for the duration of how long it's applicable.

1:4:7.10 --> 1:4:12.190

Dianne M Brickman

So that means that they are still reported because you have to report them to exempt them right?

1:4:12.860 --> 1:4:39.40

Mikulewicz, Christopher [DEP]

They'll, they'll. We need to know what the if it's a rigid plastic container. For example, we need to know if that's being sold in the state. That's by. That's within the statute as well. But it wouldn't only need to be reported one time and that would be done through the registration. We have a revamped registration process, the soon to be launched hopefully later this year. And that'll be a component of it is identifying covered products and their specific exemption.

1:4:41.580 --> 1:4:43.840

Dianne M Brickman

OK. Thanks.

1:4:44.190 --> 1:4:46.910

Mikulewicz, Christopher [DEP]

Of course. Thank you. Is there anyone?

1:4:46.30 --> 1:4:55.50

Andrejko, Judith [DEP]

Do we have any more question? I don't see anymore. Oh, oh, there we go. Hi, Clarence.

1:4:56.770 --> 1:5:2.840

Clarence Rasquinha

I just got something that Chris mentioned about a revamped registration process.

1:5:3.20 --> 1:5:4.510

Mikulewicz, Christopher [DEP]

Yeah.

1:5:3.990 --> 1:5:7.300

Clarence Rasquinha

So. What is the timing on that? OK.

1:5:9.710 --> 1:5:22.210

Mikulewicz, Christopher [DEP]

Spring 2023. Within the next couple of months, we're working with our software developers to develop more of an electronic process rather than having a fillable PDF just to make it more user friendly.

1:5:23.620 --> 1:5:24.580

Clarence Rasquinha

OK, very good. Thank you.

1:5:26.580 --> 1:5:31.90

Andrejko, Judith [DEP]

All right, Susan Viall. Hi, Susan, how are you?

1:5:32.760 --> 1:5:43.610

Viall, Susan

My microphone down. I'm good. I just wanted to expand on the question that was asked previously about the industrial - post industrial is not reportable?

1:5:44.370 --> 1:6:10.420

Mikulewicz, Christopher [DEP]

Yes, that that wouldn't be. It wouldn't be allowable under the calculation. So if you're going to factor in post industrial it would not be allowed under the statute requirements just because under the definition of post consumer recycled content in the law, it specifically excludes post industrial sourced material from being considered post consumer.

1:6:5.320 --> 1:6:12.780

Viall, Susan

OK, so you said that they would have to report it once and that is like once ever or once per year, once per month once.

1:6:12.890 --> 1:6:28.680

Mikulewicz, Christopher [DEP]

That was only for the for exemptions for covered products, like if it's sold in a rigid plastic container, but the product itself would be exempt, say under the FIFRA requirements. For example, as long as that product continues to meet that exemption, it would only have to be reported one time.

1:6:29.160 --> 1:6:34.750

Viall, Susan

But you're going to need a weight. I see.

1:6:31.890 --> 1:6:44.360

Mikulewicz, Christopher [DEP]

No, it wouldn't have to. It wouldn't need to specifics. We just need to know that the that said, the specific citation for the exemption that that it qualifies for.

1:6:39.720 --> 1:6:46.150

Viall, Susan

I get you. OK. So that that's all that would be would have to file. Is the exemption OK?

1:6:46.0 --> 1:6:46.730

Mikulewicz, Christopher [DEP]

Yes, exactly.

1:6:46.900 --> 1:6:47.750

Viall, Susan

Thanks for clarifying.

1:6:48.110 --> 1:6:48.550

Mikulewicz, Christopher [DEP]

Of course.

1:6:50.830 --> 1:6:54.570

Andrejko, Judith [DEP]

Are there any other questions? Dennis Hart.

1:6:56.100 --> 1:7:19.460

Dennis Hart

Yes, on that part about the exemptions, have you considered just granting an exemption since it's exempt under the law without having to submit any paperwork. I mean, if people are shipping FIFRA regulated pesticides that are exempt under the law. Couldn't you just give sort of like a general blanket recognition of that exemption without requiring people to submit?

1:7:20.600 --> 1:7:38.830

Mikulewicz, Christopher [DEP]

So the law requires regardless of exemption status, to register with us, and that through that registration you'll indicate whether the products are exempt. That's just in the statute as written in the registration section, if the manufacturers has exempt products are required to report that one time.

1:7:43.970 --> 1:7:56.390

Andrejko, Judith [DEP]

All right. Right.

1:7:43.980 --> 1:8:41.530

Mikulewicz, Christopher [DEP]

All right. I'm not seeing any more hands on this question either. So it looks like we will be moving forward with the by weight language as included in the in the statute. All right, that's easy, Christina. Next slide, please.

All right. And this is the last slide for recycled content calculations. We want to know what methods are out there for calculating recycled content. And one of the pros and cons of the various methods the Department is aware of the mass balance approach, but we want to know if there's other recognized approaches out there and what the drawbacks and benefits of each are and additional and we would like to know a little bit more about the mass balance approach as well. Just to further clarify how that could be incorporated into the rules. I was expecting a lot more from this one.

1:8:47.210 --> 1:8:48.680

Andrejko, Judith [DEP]

First up, we have Ally Peck.

1:8:50.20 --> 1:9:0.530

Ally Peck

Yeah, I don't have an answer for you, but I was wondering if maybe we could get like a list of these questions after the call. And I can give you some additional feedback possibly.

1:9:0.220 --> 1:9:14.710

Mikulewicz, Christopher [DEP]

Yes, like last time as well. The presentation and the recording will be made available once posted to the website and everyone will get a link to that to the recording and the presentation once it's posted to the website.

1:9:15.460 --> 1:9:15.710

Ally Peck

Right.

1:9:15.520 --> 1:9:17.660

Andrejko, Judith [DEP]

And Nell just put the link in the chat.

1:9:18.670 --> 1:9:43.350

Mikulewicz, Christopher [DEP]

Perfect. Thank you, Nell. And as always, you can always follow up with us as well. If you don't feel comfortable answering right now or you want more time to think, feel free to reach out to us at any point to elaborate a little bit more on the different various recycled content calculation methodologies that are out there and available for manufacturers.

1:9:45.870 --> 1:9:47.180

Andrejko, Judith [DEP]

OK. Dennis has a question.

1:9:47.390 --> 1:9:55.970

Dennis Hart

Sorry. Again are you asking for the specific names of companies that are that are used or utilized for third party certification? Is that what that question is?

1:9:56.400 --> 1:10:15.530

Mikulewicz, Christopher [DEP]

Oh, no, not specific companies. For the next question, we're just trying to get a better understanding as to the capabilities for third party certifiers and how they are able to, if they are able to verify recycled content calculations if needed by the department for either consult out or request a verification of some of some form.

1:10:20.440 --> 1:10:21.50

Dennis Hart

I thank you.

1:10:20.580 --> 1:10:24.860

Mikulewicz, Christopher [DEP]

So yeah, no problem. We do have -- (speaker interrupted)

1:10:24.360 --> 1:10:26.140

Andrejko, Judith [DEP]

We have clearance.

1:10:27.890 --> 1:10:32.390

Clarence Rasquinha

So I assume I assume you're asking this question for audit purposes.

1:10:32.810 --> 1:10:33.780

Mikulewicz, Christopher [DEP]

Yes, yes.

1:10:36.110 --> 1:10:51.350

Clarence Rasquinha

OK, depending on the substrate it, it might be very, very challenging based on my engineering experience to do it to take this to a third party lab for example. I'm not saying it's impossible. But very challenging. Yeah, I would say for sure. So.

1:10:52.210 --> 1:10:53.420

Mikulewicz, Christopher [DEP]

OK, that's good to know.

1:10:53.250 --> 1:11:3.360

Clarence Rasquinha

Particularly, it comes with paper or corrugated. There are. There are mechanisms where you could where, but it's quite in detail and quite pricey too to verify so.

1:11:3.960 --> 1:11:52.700

Mikulewicz, Christopher [DEP]

Right, right. Yeah, we have. We are aware of that as well and it will most likely be an agreement between the all

the parties involved to make sure that the third party certifiers are that that they're specifications for what they're permitted to do are explained clearly and concisely. So then this question is to really help inform that process once we get there. And even if we get there, being that there is a third party certification component in the compliance certification report of section 14 allowing the department to use third party certifiers in conjunction with or in partnership with the manufacturing industry. So really trying to get a better understanding as to what they're capable of doing and if they're able to verify recycled content calculations.

1:11:53.830 --> 1:11:57.110

Andrejko, Judith [DEP]

Chris, Next up we have Adam Peer. Hi, Adam. How are you?

1:11:57.870 --> 1:12:48.670

Peer, Adam

Hi, thank you for doing this. I'm definitely learning a lot. I just wanted to add to this question that we'd be happy to provide the department with some certification programs that we've seen that we think that apply to our industry as well as the process that they go through to be audited and actually certify the both the recycled content and then the methodology. Cause I think what's coming through on this call at least for me and it's been mentioned a few different times is that a lot of the math and details really matters to this. In order to recognize that it's a North American market and we need to make sure that the calculations make sense for the footprint that material circulates through, so we'd be happy to provide the department with that information for your consideration, especially on this question.

1:12:49.270 --> 1:12:49.640

Andrejko, Judith [DEP]

Great.

1:12:48.990 --> 1:12:51.430

Mikulewicz, Christopher [DEP]

Yeah, that'd be helpful. That'd be very helpful. Thank you.

1:12:52.90 --> 1:12:57.280

Andrejko, Judith [DEP]

Wonderful. Thank you so much. Next? John Catalano, welcome back John.

1:12:59.170 --> 1:13:11.100

John Caturano -Nestle NA

Thank you. The APR, the Association of Plastic Recyclers for Plastic specifically last year launched a PCR certification. I'm happy to put it in the chat for you if you want to look at it.

1:13:11.540 --> 1:13:13.800

Mikulewicz, Christopher [DEP]

Yeah, gladly. Thank you.

1:13:12.580 --> 1:13:21.900

John Caturano -Nestle NA

And I can also connect you. Yeah, it's a really robust program that gets to certification for plastics and that potentially is an option for you to consider.

1:13:22.590 --> 1:13:23.790

Mikulewicz, Christopher [DEP]

Thank you. That'd be very helpful.

1:13:23.360 --> 1:13:28.750

Andrejko, Judith [DEP]

Awesome. Thank you much. Next we have Dennis Slater my Dennis, how are you?

1:13:29.230 --> 1:13:30.440

Slater Dennis (AA/MBL-NA)

I'm good. How are you? Thank you.

1:13:30.800 --> 1:13:31.330

Andrejko, Judith [DEP]

Thanks.

1:13:31.880 --> 1:13:48.170

Slater Dennis (AA/MBL-NA)

If your product is manufactured and packaged overseas and shipped in, how would you be able to use a lab overseas to do this, say in Europe? Or would you have to have it certified by a lab here in the US?

1:13:49.910 --> 1:14:9.880

Mikulewicz, Christopher [DEP]

I don't think we have the answer to that question just yet. I think it's something I have to definitely consider in the rulemaking meetings that we have, but that's something I will definitely take into consideration being, you know, I'll have to consider capabilities of European labs and how they differ from American labs and so forth. So that will just be something we have to have additional conversations on, but thank you.

1:14:9.60 --> 1:14:13.410

Andrejko, Judith [DEP]

And if you have a viewpoint on it, please feel free to send us some literature on it.

1:14:15.270 --> 1:14:15.690

Slater Dennis (AA/MBL-NA)

OK.

1:14:13.910 --> 1:14:16.610

Mikulewicz, Christopher [DEP]

Yes, please. Thank you for bringing it to our attention.

1:14:20.210 --> 1:14:20.560

Andrejko, Judith [DEP]

Sure.

1:14:18.730 --> 1:14:53.800

Slater Dennis (AA/MBL-NA)

Could I ask one other question? If the addition of post consumer recycled content changes the structure of your packaging say if you're using clear plastic and use a recycled content and it changes that and makes it a cloudy is that something that could be exempt or is that something that manufactured with then just have to change their packaging design to accommodate.

1:14:55.620 --> 1:15:18.30

Mikulewicz, Christopher [DEP]

I don't know if you have an answer for that one for that specific question, we'll have to. We'll have to refer you back to the specific waiver and exemption requirements in the in the law. I think there's section 10 and 12. It could be wrong on that, but it will have to refer you back and stick to the statute, the statutory language for right now and then further discuss that in our rulemaking meetings as well.

1:15:18.960 --> 1:15:22.850

Andrejko, Judith [DEP]

And Nell just put a link to the Recycled Content Law in the chat.

1:15:24.170 --> 1:15:50.260

Mikulewicz, Christopher [DEP]

Just one follow up question. Does that cloudiness or the addition of recycled content is that does that sacrifice the structural integrity or the Health and Human safety aspects of the packaging? Just for clarification. Yeah.

1:15:41.500 --> 1:16:2.990

Slater Dennis (AA/MBL-NA)

No it doesn't. It would just be a I mean, you can see the product obviously in the clear packaging and if it becomes cloudy then then you've eliminated that. In this may have been discussed before, but if you don't have post-consumer recycled content available. What's your avenues for that?

1:16:3.910 --> 1:16:23.220

Mikulewicz, Christopher [DEP]

There are waivers and exemptions in the in the law, the waiver section I believe is section 11 again don't quote me on that. They're all-around section 10 and 15 of some within that within that range. But yeah, there are waivers for availability of materials, technological infeasibility and so forth.

1:16:25.930 --> 1:16:26.470

Slater Dennis (AA/MBL-NA)

Thank you.

1:16:27.120 --> 1:16:27.840

Mikulewicz, Christopher [DEP]

Of course. Thank you.

1:16:29.120 --> 1:16:30.740

Mikulewicz, Christopher [DEP]

I think we are ready to move on.

1:16:31.190 --> 1:16:31.890

Andrejko, Judith [DEP]

I think so.

1:16:33.290 --> 1:16:34.350

Mikulewicz, Christopher [DEP]

Christina, next slide please.

1:16:33.590 --> 1:16:36.870

Andrejko, Judith [DEP]

And just to let you know the timing right now we're at 2:20.

1:16:37.480 --> 1:16:37.890

Mikulewicz, Christopher [DEP]

All right.

1:16:37.520 --> 1:16:39.630

Andrejko, Judith [DEP]

So we're about halfway.

1:16:40.140 --> 1:16:41.210

Mikulewicz, Christopher [DEP]

Yeah, sounds good.

1:16:54.390 --> 1:16:55.570

Andrejko, Judith [DEP]

OK, sounds good.

1:16:42.710 --> 1:19:55.750

Mikulewicz, Christopher [DEP]

We should be the next few. The next discussion topic isn't as long as the first one, so hopefully we'll we won't. Maybe we might not have to go the full time, but we'll see how the discussion plays out. All right, so on to our next topic. So we at that concludes our first discussion topic for today's meeting. Let's shift our focus to our second topic, covering the annual Compliance certification report requirements like the last topic. We'll begin with an overview of the statutory requirements for compliance certification reports leading to a discussion to further clarify how applicable provisions will be addressed in the regulations for this law. So the following slides will contain language from Section 14 of the Recycled Content Law to provide that overview of the requirements in the law. So with that, Christina, can you go to the next slide please?

So from the law, manufacturers are required to certify that they're covered products are complying with the requirements of the law. Furthermore, manufacturers are to certify whether their covered products are exempt or approved for a waiver from the requirements. Manufacturers are also required to specify the exemption claim for each of their covered products, along with proof of such exemptions, such as citations to federal law, rule or regulation, or certify that their products are intended for human or animal consumption. Manufacturers are only needed to certify an exemption one time for the duration of an applicable exemption, unless there are changes to the product packaging or the product itself, or if the exemption no longer applies to that covered product. Next slide please.

The certification for the Compliance certification report must be signed by an authorized representative of the from the manufacturer and include the amount in pounds of virgin plastic, glass or paper and the amount in pounds of post consumer recycled content used in conjunction with covered products from the from the Law. Next slide please.

So please be advised that the Department may audit or investigate a manufacturer at any time to assess the manufacturers compliance with the requirements of this Act. For this reason, it is important to be forthcoming regarding manufacturer capabilities surrounding recycled content data collection to better inform the Department on what manufacturers can provide. So with that, we can move to the next slide and begin the discussion on compliance certification reports. So this is just a break in the slides to break up the discussion topic from the overview. Next slide please. Oh perfect. Thank you Christina.

So with this slide, we are just looking to have the obligations for the regulated Community align with what manufacturers already do to avoid the duplication of efforts, we would like to the new program to work with the existing framework with the industry where possible. So with that, what should the department be aware of when complex when collecting compliance data? I think we already got into a little bit of this, but we're also looking for what can be provided to substantiate recycled content utilization claims when providing the compliance certification reports. So again, we might have touched upon this a little bit more. We're looking for more detail as to what can be provided to document the recycled content was actually utilized in the in the event that there is an investigation or audit caused began by the Department.

1:19:58.120 --> 1:20:23.960

Andrejko, Judith [DEP]

Like for example with some other states requiring the use of – a certain percentage of recycled content. Is there any particular record keeping or other type of tracking that the companies would have for how much recycled content is in their different products?

1:20:24.590 --> 1:20:34.630

Mikulewicz, Christopher [DEP]

Exactly. While there's the compliance certification report, we are looking to make it as simple as possible. As mentioned, the Department can audit or investigate at any point.

1:20:43.380 --> 1:20:43.730

Andrejko, Judith [DEP]

Yeah.

1:20:36.90 --> 1:20:49.870

Mikulewicz, Christopher [DEP]

So we need to know what we can request in the form of documentation as evidence for incorporating that recycled content rather than just relying on that compliance certification report. Exactly.

1:20:49.930 --> 1:20:59.400

Andrejko, Judith [DEP]

And like we'd like to work with what's already there. That's another thing, because we want to make this more of a seamless introduction into the industry already, Diane, welcome back.

1:21:0.710 --> 1:21:21.130

Dianne M Brickman

Yeah. So well, since California requires they have that certification document that's what we use signed by our rigid plastic product manufacturers - they sign it. And they tell us what products and how much of recycled content and source reductions on it, so.

1:21:22.790 --> 1:21:31.710

Andrejko, Judith [DEP]

With that certification, do they have to provide any additional documentation like to back up the cert., or is it just the certification itself?

1:21:32.150 --> 1:21:33.590

Dianne M Brickman

Just itself, yeah.

1:21:33.450 --> 1:21:33.810

Andrejko, Judith [DEP]

OK.

1:21:34.410 --> 1:22:43.280

Mikulewicz, Christopher [DEP]

Got it. When purchasing or procuring recycled content aside from like maybe a contract or something you have with the supplier, are there do they does it supply or maybe also provide receipts or invoices? Or maybe have like purchase records of actually purchasing the recycled content? We're just trying to give some examples. Maybe the jog, some comments here, but we need to know what is available out there. I remember reading the California's AB 793 rules that they had they had published. They know they require, like shipping manifests or material data sheets or purchase records. Is that something that is able to be provided? We haven't, we haven't really discussed with California's staff or how they, how that came about. So we would like to hear from regulated Community first before reaching out to other states that are also looking into this topic. And as always, if you want more time to

think about this, you can always reach out to the recycled content e-mail inbox. It'll be available at the end of our presentation today.

1:22:49.50 --> 1:22:50.740

Andrejko, Judith [DEP]

I don't see any hands yet, Chris.

1:22:51.380 --> 1:22:52.170

Mikulewicz, Christopher [DEP]

Not seeing anything.

1:22:52.280 --> 1:22:56.770

Andrejko, Judith [DEP]

Oh Scott DeFife. Hi Scott. How are you doing this afternoon?

1:22:56.860 --> 1:23:18.40

Scott DeFife

I'm alright. Sorry I couldn't be on for the first few minutes but I had some colleagues on the only thing I'll say here is it's very different for glass than for the world of plastics and I think that a lot of the people who are producers or manufacturers under New Jersey law are going to require.

1:23:23.400 --> 1:23:23.780

Mikulewicz, Christopher [DEP]

Mm-hmm.

1:23:19.90 --> 1:23:50.80

Scott DeFife

Utilizing reps and warranties from their suppliers for the amount of recycled material that is used. As we've said in comments before recycled glass is just glass. It's the same. It's not materially different than the first time glass. And so I think there's going to be - we can't necessarily do it completely the same for all materials.

1:23:51.400 --> 1:24:12.0

Mikulewicz, Christopher [DEP]

OK, that that is good to know. If you have any like examples or preferences for how you would like the like the glass specific requirements and the compliance certification reports, feel free to e-mail the recycled content e-mail inbox as well. That way we can figure out how to address that in the rules as well for specifically for glass event only if that only pertains to glass. Of course. Thank you.

1:24:12.140 --> 1:24:16.800

Andrejko, Judith [DEP]

All right. Thank you, much. Next Doug Sheffield. Hi again, Doug

1:24:17.430 --> 1:24:44.150

Sheffield, Doug

Hello. So we do operate in California. The only thing that's required out there is the certification letter. That there is there is an audit component for proof we we've never actually counted, but theoretically there's an audit requirement that would show proof of purchases either through PO's and or invoices.

1:24:45.330 --> 1:24:51.840

Sheffield, Doug

But again, we've never been asked for him, but that's the requirement out there.

1:24:52.240 --> 1:24:55.230

Mikulewicz, Christopher [DEP]

Got it. That's helpful. That's good to know. Do they have -- *(speaker interrupted)*

1:24:54.840 --> 1:25:2.400

Sheffield, Doug

And I believe it's the same for the for the Washington law that went into effect January as well.

1:25:2.830 --> 1:25:20.650

Mikulewicz, Christopher [DEP]

Right, right. That's good to know. Just in general, for any given manufacturer what does that record keeping look like? Is it for certain period of time do you keep it for like maybe five years and then discard or destroy or something like that or just what does that record keeping look like?

1:25:23.330 --> 1:25:41.130

Sheffield, Doug

So I think for audit purposes it's five years, I think our company policy I think is 10, but in reality. You know in invoicing electronic systems like we have, it's almost indefinite, so.

1:25:42.250 --> 1:25:53.720

Mikulewicz, Christopher [DEP]

OK, that's good to know as well. Thank you. Just want to get a better understanding of see what the maybe what the internal systems might look like that way we can make sure we're not asking for something that isn't available or readily available. So thank you.

1:26:0.390 --> 1:26:0.940

Andrejko, Judith [DEP]

I think so.

1:25:56.320 --> 1:26:48.640

Mikulewicz, Christopher [DEP]

I think we covered all of the questions on this slide. I think we're good to move forward. Christina, next slide please. Thank you. And again I think we kind of touched upon this through the previous discussions, but really this is to get a better understanding of whether the 'in pounds' requirement because this is by statute a manufacturer will be required to submit the data on an 'in pounds' basis. So we want to know if that 'in pounds' requirement will be problematic for any manufacturers. And if so, would a conversion factor maybe in the rules or something like that, assist with converting to it to pounds for example? You don't have to spend too much time on this one again, but just want to, you know, give an opportunity for those manufacturers that might have a problem with the 'in pounds' requirement.

1:26:50.650 --> 1:27:1.40

Andrejko, Judith [DEP]

And from today's discussions we know that there's the 'in pounds' issue. There's the 'in grams' issue. Yeah.

1:26:56.420 --> 1:27:7.580

Mikulewicz, Christopher [DEP]

Right, right. Exactly. And I don't think I wasn't anticipating getting into that much detail that earlier on, but I'm happy to have covered it whenever we could.

1:27:6.300 --> 1:27:33.340

Andrejko, Judith [DEP]

Yeah, I don't think there's we, we didn't find out about any of third unit of measurement, did we? OK. Yeah.

1:27:11.510 --> 1:27:33.930

Mikulewicz, Christopher [DEP]

Right no, maybe volume. I think volume was mentioned as well at some point, but for the most part, it's going to be weight in pounds and maybe grams and having a conversion factor of some form maybe in the compliance certification report or something like that, we'll have to consider how to exactly go about that. But it doesn't sound like it's going to be too problematic for most manufacturers as they already get the data in weight.

1:27:34.640 --> 1:27:40.420

Andrejko, Judith [DEP]

I'm not seeing any hands that seem to have an issue with it today so.

1:27:41.960 --> 1:27:43.740

Mikulewicz, Christopher [DEP]

All right. I think we're good to move forward then.

1:27:44.200 --> 1:27:44.820

Andrejko, Judith [DEP]

I think so.

1:27:46.270 --> 1:28:34.840

Mikulewicz, Christopher [DEP]

So with that, I know, I know we've kind of already touched upon this first question as well, but we want to know if it's possible for many factors to provide a breakdown in particular content by brand rather than covered product category. I know we've heard from manufacturers already that want it to be as simple as possible, but. And maybe this is a case-by-case scenario, but is it possible to break that to break the calculations down by brand rather than just going along the surface level of covered product category? Maybe we shouldn't spend too much time on this, considering heard enough of the of the preferences from manufacturers so far today. So we want to make sure that we are covering questions that we have and maybe touched upon so.

1:28:36.970 --> 1:28:49.80

Mikulewicz, Christopher [DEP]

Yeah, let's skip this question. I think we've heard enough on this on this topic. So moving forward, we want to know what information shared with the Department would be considered proprietary information. We want to make sure that when data and information comes in that we are filing as appropriate. So if there is any proprietary information we want to make sure that we aren't going to ask for it or if we do ask for it, we know that it is proprietary so that we have to make [sure that] if we are ever asked for records, for example, that we omit that proprietary information. So we're really trying to get prepared as to what we can expect might be proprietary information when reports come in.

1:29:18.390 --> 1:29:21.320

Andrejko, Judith [DEP]

Especially in light of the Open Public Records Act in New Jersey.

1:29:22.0 --> 1:29:22.550

Mikulewicz, Christopher [DEP]

Exactly.

1:29:28.440 --> 1:29:45.20

Andrejko, Judith [DEP]

And has this been an issue in any of the states that have similar legislation? OK, we're not.

1:29:45.780 --> 1:29:48.150

Mikulewicz, Christopher [DEP]

I think we got tired out from the first discussion topic.

1:29:49.540 --> 1:29:55.620

Andrejko, Judith [DEP]

No big feedback on this one. If there is, I'm wondering if we're not getting much feedback because it's all proprietary.

1:29:56.290 --> 1:29:57.880

Mikulewicz, Christopher [DEP]

Could be it's a good point.

1:29:58.290 --> 1:30:0.840

Andrejko, Judith [DEP]

Dianne has her hand up. Hi again, Dianne.

1:30:1.430 --> 1:30:46.230

Dianne M Brickman

Hi so I don't know really the answer to this but my guess is that if you were going to post the amount of you know, percentage of post consumer recycled content by brand on a website. You know, if you go back to your Heinz, ketchup your Heinz line example and say you know Heinz uses, you know, 20% recycled content and this other brand is 10 or, you know, I don't know if that would be like public shaming to the brands that are lower or what? And so in that case I think it would be kind of proprietary so that you know the brands that haven't quite got there yet wouldn't want their information shared publicly.

1:30:46.990 --> 1:30:47.260

Mikulewicz, Christopher [DEP]

Right.

1:30:47.240 --> 1:30:51.970

Dianne M Brickman

That's the only thing I can think of and I we could I'm thinking through theoretically.

1:30:59.890 --> 1:31:0.190

Mikulewicz, Christopher [DEP]

Right.

1:30:52.750 --> 1:31:5.980

Dianne M Brickman

Do the breakdown by brand, but again, it would be more work. So your third question of how can we make it as simple process as possible? It's just allowing us to give you the percent of PCR content by category.

1:31:6.380 --> 1:31:8.600

Mikulewicz, Christopher [DEP]

Got it. That's good to know.

1:31:8.80 --> 1:31:9.730

Andrejko, Judith [DEP]

And we've come full circle.

1:31:10.280 --> 1:31:45.270

Dianne M Brickman

Yeah. So, I mean, I'm thinking of this as like me having to do the reports and all the work it takes and everything and going back to the exempt. products, I mean we have hundreds of thousands of products and many, many product lines. So and we have many brands that are totally exempt. So they're industrial products or you know OEM automotive products that would never go to a consumer. Would it be available for us to just exempt a whole brand. A product and instead of listing every individual product?

1:31:46.280 --> 1:31:55.290

Mikulewicz, Christopher [DEP]

If that is the case and the entire brand would be exempt, all we would ask is that you provide the name of that branch that we just so that the department knows that that brand is exempt.

1:31:55.880 --> 1:31:58.870

Dianne M Brickman

OK. Thanks.

1:31:59.750 --> 1:32:0.220

Mikulewicz, Christopher [DEP]

Thank you.

1:31:59.540 --> 1:32:4.0

Andrejko, Judith [DEP]

Alright, thank you. Next question is from Terry Hall. Hi Terry. How are you doing this afternoon?

1:32:5.570 --> 1:32:23.110

Terry Hall

I'm doing well. Thank you. I just have a couple statements about this whole slide in general, on the first one, it really needs to be by covered product category cause brands can cover several different categories. So you could have one brand that's in multiple categories.

1:32:27.90 --> 1:32:27.550

Terry Hall

Yeah.

1:32:24.80 --> 1:32:31.230

Andrejko, Judith [DEP]

Which would go back to, I think, like the Tide and the Gain, where you have flings, liquids, sheets, what have you.

1:32:31.330 --> 1:32:41.60

Terry Hall

Powders, etcetera. Yes, exactly proprietary information. That's a little hard to answer until we kind of know what you're looking for and what you're going to ask.

1:32:55.900 --> 1:32:56.240

Mikulewicz, Christopher [DEP]

Right.

1:32:41.920 --> 1:32:57.910

Terry Hall

and the third one at least burdensome as possible, refer to question one. It needs to stay as covered product category rather than brand cause trying to break out brands that are in multiple categories would be an ultimate nightmare. Thank you.

1:32:58.520 --> 1:33:0.180

Mikulewicz, Christopher [DEP]

Yeah. No thank you.

1:32:59.360 --> 1:33:0.570

Andrejko, Judith [DEP]

Alright, thank you very much.

1:33:0.830 --> 1:34:23.830

Mikulewicz, Christopher [DEP]

And definitely wasn't a consideration, something I'd considered before. As you know, there could be, there could be one product that falls under multiple cover product categories. So definitely don't want to have to double count for example. So thank you. That's very helpful. Alright, I don't see any more hands raised for this one. I think we're good to move on. So Christina, next slide please.

Perfect. Thank you. So really with this slide, the department is trying to better understand how supply chains were impacted by the pandemic and the resulting supply chain constraints in order to assess the current landscape of procuring recycled materials, we would like to hear from you regarding the health of supply chain operations both during and after the pandemic. That way we can get up understanding maybe like the availability of materials, how materials are moving through supply chains and so forth. So this is more. This isn't pertaining to any of the discussion topics gotten too. We just want to get a we want to be prepared for when the standards take effect. What's going on - maybe in the landscape now so that we can predict what might look like in the future. So with that, how of supply chain issues affected business operations and procurement of recycled content both in the past and currently? And if and to follow up with that, if operations have not returned to the "normal", do you foresee a return to normal operations and then your future?

1:34:33.320 --> 1:34:35.670

Andrejko, Judith [DEP]

Doug Sheffield.

Hi, Doug.

1:34:37.0 --> 1:35:33.550

Sheffield, Doug

Hello. So I don't know if it's necessarily all pandemic related, but I can tell you in the blown film space. The PCR in general, the availability is extremely tight. It's not a material that's you know, necessarily really easy or plentiful to get a hold of and. You know, so and I don't know that I see that getting any better anytime soon. just because of the you know, law laws like this from California, Washington and other states. It's just it's - there's a very, very tight supply. Kurt.

1:35:22.380 --> 1:35:34.140

Mikulewicz, Christopher [DEP]

Right. So is the, is it blessed of a factor of the of like external factors like the pandemic and it's more so of factor of the general supply of recycled materials.

1:35:34.720 --> 1:35:49.670

Sheffield, Doug

Yeah, correct. I mean there, there were. There were some pandemic related effects on it, I'm you know, for the past year and a half. But in general is the bigger issue in my opinion.

1:35:50.10 --> 1:36:18.380

Mikulewicz, Christopher [DEP]

Right, right. And I think one of the reasons that prompted this question was that when this bill was going through the legislature and during testimonies and stuff, a lot it was going on during 2020 and 2021, when the pandemic was, you know, right in our right in the forefront of things. So we want to see how things have changed and progressed and evolved since then. So just trying to get a better handle and grasp on that on that or in that realm that that's helpful. So thank you. It is really helpful for us.

1:36:18.950 --> 1:36:21.400

Andrejko, Judith [DEP]

And next up we have Scott Defife. Hi, Scott.

1:36:22.200 --> 1:37:47.460

Scott DeFife

Hello I would say that the pandemic did have an effect on the availability of recycled glass supply. Things have been tight. The industries that use recycled glass use all of the available tons of recycled glass generally but during the pandemic. And because a lot of the weight, the communities had to either halt pause or cease recycling operations. That did not help, I would tell you that it is vastly different in the areas of the country that have bottle bills or something like that that, you know have a large supply of materials. So there's going to be parts of the country that have been able to recover faster. Even the pandemic stopped all returns in most states that had bottle returns, that's picked back up. But the rest of the community recycling has not. So, I would say three to five years from now when some of the new EPR laws kick in. You know, we're hope we'll have more, but at this moment, it's. Were. We're back to Pre-pandemic in bottle bill states. We are not back to pre-pandemic in areas that do not have other supply side programs.

1:37:47.940 --> 1:37:49.700

Andrejko, Judith [DEP]

Thanks for the perspective. Thank you.

1:37:49.400 --> 1:37:50.130

Mikulewicz, Christopher [DEP]

Yes, thank you.

1:37:51.40 --> 1:37:54.460

Andrejko, Judith [DEP]

Next, we have John Catalano.

1:37:55.500 --> 1:38:28.640

John Caturano -Nestle NA

Yeah, I could just echo a little bit of what Scott was saying. We did see almost an 80% decline in the deposit States and obviously in the Northeast that could impact the place like New Jersey that has come back curbside, picked up a little bit throughout that time and I think that's just a just a fair data point to mention that there was a significant drop in collection. The RVM reverse vending machine kiosks in front of stores were shut down. So it's a mindful data point that you have here to talk about it.

1:38:29.640 --> 1:38:46.90

Mikulewicz, Christopher [DEP]

Yes. Now we want to be aware of current events and things going on within the industry that might be out of manufacturers' control or you know stuff that you know, things that we cannot control as the department. So I just want to keep ahead of any of those any of those actions. So thank you.

1:38:46.540 --> 1:38:49.20

Andrejko, Judith [DEP]

Alright. Thanks, John. Next up, Dianne.

1:38:55.940 --> 1:38:56.490

Mikulewicz, Christopher [DEP]

Please do.

1:38:51.980 --> 1:39:51.400

Dianne M Brickman

OK, I hate to hog the floor all the time, but here I go and I'm not an expert by any means. I'm just seeing my point of view, but I live in a rural area and we they've recently removed all recycling drop off bins so we don't have curbside recycling unless you want to pay for it. So it's kind of a lot of money, but I'm considering it because I really, really want to recycle and I really hate to go dropping it off and bins I have to drive pretty far. But anyway they really removed it. I heard because people were not dropping off the right things they were putting, you know, manufacturing, building materials and stuff. And they weren't doing it right. They weren't cleaning things. I don't know what else, but they stopped. So I all I know is recycling is kind of going down in some places. So until there's a federal mandate or they optimize universal waste collection and separation, I think it's really going to be hard to get more PCR content.

1:39:52.380 --> 1:40:8.890

Mikulewicz, Christopher [DEP]

Right. Yeah. And it sounds like there it sounds like just from general comments we've heard so far, is that it while the demand is there, there needs to be some also an intervention on the supply as well to make sure that they're you know the standards are achievable for all manufacturers. Thank you.

1:40:9.890 --> 1:40:12.840

Andrejko, Judith [DEP]

Alright. Next we have Robert Locke. Hi again, Robert.

1:40:14.70 --> 1:43:31.950

Lock, Robert

Hi again. I'm sure you already do subscribe to this, but I strongly suggest subscribing to waste dives newsletter. That'll give you a good broad overview and update on PCR and where recycling program stop and start. So I think overall the availability from where food and beverage manufacturer PCR is available. It's we have to obtain food grade PCR and that means that the resin supplier needs to have an FDA letter of no objection. Which sort of narrows even further. Our supply of PCR, but it is available and there's two different approaches. One is that we make some of our own bottles. So in that case, we're buying our own resin - little pellets. And in other cases we have bottle suppliers. We've seen some of our bottle suppliers acquiring companies that make PCR resin, and I've definitely seen an uptick in that in that in the last couple years because they see the pipeline in terms of demand, so they want to be able to provide their customers with integrated PCR for the bottles that are showing up at our facilities. I think it is a little bit more challenging on the on the pure resin suppliers. Because in those situations they're looking at either - will be either looking at mixing virgin and PCR resin at our facilities. And in some cases, those residents suppliers are considering creating individualized pellets where the PCR's integrated to each pellet at a certain level. So the PCR is there. It's certainly more expensive right now. And timeline makes a big difference as well - Six months, eight months a year - you know, being able to lock in volumes and while working on your existing inventory or being able to project across certain lines in certain states, that's all kind of affecting how we go about thinking to procure PCR either for our resin or for asking our suppliers to integrate PCR into the bottles they make so like other things, whether just demand or pandemic related or supply chain related, the timelines for these things, especially since some of like our bottle suppliers, if they're going to provide us a bottle with PCR,

they're upgrading equipment on their end of things to make them also and sometimes that equipment availability is, you know, six months to a year to upgrade that equipment. So we're trying to be as proactive as possible along with the states, but timing does impact things as well as costs from a business decision standpoint.

1:43:32.850 --> 1:43:45.290

Mikulewicz, Christopher [DEP]

So it sounds like there's a number of variables that need to be accounted for, but it's not that the solutions aren't there. There are solutions, they need to be brought up to scale and they need the time to be able to do that.

1:43:45.870 --> 1:44:5.440

Lock, Robert

Yeah, correct. We're seeing investments being made, particularly on our bottle suppliers. They see the writing on the wall with PCR and EPR laws, so. That, that's just going to take some time for them to get that equipment in place and to make those acquisitions and to ensure the resin meets the FDA standards, things like that.

1:44:6.840 --> 1:44:9.560

Mikulewicz, Christopher [DEP]

Well, that's good to know. So thank you for that. Thank you for your input.

1:44:10.600 --> 1:44:21.280

Andrejko, Judith [DEP]

Alright. Thanks Robert. John Caturano, do you still have your hand up from before or do you have an additional point? Just want to make sure I'm not missing you.

1:44:24.620 --> 1:44:27.560

John Caturano -Nestle NA

No, I'm sorry. I'll take that down. Thank you. My apology.

1:44:27.490 --> 1:44:28.580

Mikulewicz, Christopher [DEP]

Thank you.

1:44:26.970 --> 1:44:34.600

Andrejko, Judith [DEP]

Alright, no worries. Nope.

1:44:29.870 --> 1:45:27.600

Mikulewicz, Christopher [DEP]

All right. I'm not seeing any more hands for this question or these questions. So I think we're good to move forward. Christina, can you advance the slides, please? Right. So we want to say thank you for participating in today's stakeholder meeting. At this time, we would like to open the floor for any lingering questions or comments that may not have been addressed during today's meeting or if you would like to further add any discussion or comments on now would be the time to do so. We just want to provide the opportunity for you to chime in with anything that might be lingering, but we do ask to keep the questions or comments relevant to today's discussion. Topics being on calculating recycled content and the compliance certification reports. That way we can keep the questions and comments more relevant to today's discussion. Pause making everyone 20 years 20-30 seconds to come up with some additional questions or comments you may have. And as always, you can always e-mail the recycled content e-mail inbox that will be at the end of today's presentation.

1:45:28.770 --> 1:45:31.840

Andrejko, Judith [DEP]

Clarence Rasquinha. Welcome back, Clarence.

1:45:32.780 --> 1:45:45.670

Clarence Rasquinha

So just confirming the locate the link that Nell sent out that that would be the location for this recorded presentation. And.

1:45:44.20 --> 1:45:54.690

Mikulewicz, Christopher [DEP]

Let me just check the link. Yes, yes, that would be the that would that. That is where the this this recording as well as the presentation will be made available probably within next week or two.

1:45:55.860 --> 1:45:56.490

Clarence Rasquinha

OK. Thank you.

1:46:5.420 --> 1:46:18.0

Andrejko, Judith [DEP]

We have CZ. Hello, C Z.

1:46:17.640 --> 1:47:8.140

C Z

Hello. Hi. Yes. I apologize if you may have covered this before, but I know there's there was at least a question I heard someone else ask about. How do we perhaps prove the lack of availability of recycled content not because of the pandemic, but just because the industry does not have it available. So in our industry we need food safe, you know, FDA certified, food grade plastic. So it's very hard to find PCR in this context in terms of if we need to request a waiver because a lack of availability would, for example a letter from our suppliers indicating that they are not able to get it, would that qualify us as enough documentation that there is lack of availability or what might you consider to suffice here?

1:47:9.210 --> 1:48:7.340

Mikulewicz, Christopher [DEP]

So I think a letter from like suppliers or where you're normally purchasing your recycled content would be one of the pieces we haven't really had too many discussions as to what documentation will be required for waivers. But I think that will be at least one component and then that will also be likely having additional stakeholder meetings beyond today's session to clarify what industry and manufacturers are capable of producing for, documenting an exemption or a waiver or something like that down the road, as well as the there's also section 9 allows for the adjustment of standards for a period of time that there's similar criteria in that section as it is in the waiver section, so we have further considerations to make on that topic, but I do believe a letter of some form from suppliers would be sufficient at least one component of it at least.

1:48:11.0 --> 1:48:11.460

C Z

Thank you.

1:48:10.650 --> 1:48:20.310

Andrejko, Judith [DEP]

OK. And we have noted in the chat from Dave Westerhoff that comments on "availability of PCR need to be qualified by resin type PER HDPE and PP".

1:48:21.970 --> 1:48:24.680

Mikulewicz, Christopher [DEP]

That is also very good thing to note as well. So thank you.

1:48:24.470 --> 1:48:28.20

Andrejko, Judith [DEP]

Next mail. Mary Ellen Peppard, welcome back.

1:48:29.250 --> 1:49:27.810

Mary Ellen Peppard

Hi thank you again. I just I'm one final comment on that point. I just wanted to add to the to keep in mind for of course covid with the supply chain of Labor issues and you know plant breakdowns and things like that cause huge shortages and that I believe they are coming back. I don't think we're normally yet, but something that we see in general with different sustainability laws and – you know bans or different changes is that the there will be in a really increased demand on certain like so then other types of products, right. So let's say you know I'm just going to say you ban you know you ban bags you ban polystyrene you ban a certain type of plastic or mandates certain type of plastic so the demand goes up significantly so the steps that the other states are taking are having a huge impact on the supply that's available for various materials as well.

1:49:29.150 --> 1:49:30.280

Andrejko, Judith [DEP]

Good perspective. Thank you.

1:49:30.440 --> 1:49:31.100

Mary Ellen Peppard

Thank you.

1:49:30.240 --> 1:49:31.170

Mikulewicz, Christopher [DEP]

Yeah. Thank you.

1:49:39.470 --> 1:49:39.770

Andrejko, Judith [DEP]

Nope.

1:49:36.230 --> 1:49:40.950

Mikulewicz, Christopher [DEP]

Don't see any more hands for this slide. I'll give it another 10 seconds maybe.

1:49:42.200 --> 1:49:55.820

Andrejko, Judith [DEP]

That sounds good. Just making sure that we're covering as much as we can today in these two topics.

1:49:48.780 --> 1:49:58.490

Mikulewicz, Christopher [DEP]

Exactly. We have some time at the end. So I want to make sure that we, you know, take some take some time.

Take the time we need to make sure everyone has their voices heard so.

1:49:59.230 --> 1:50:7.930

Andrejko, Judith [DEP]

And also if you're more comfortable submitting written comments, please do send it to

recycledcontent@dep.nj.gov.

1:50:11.140 --> 1:50:14.840

Mikulewicz, Christopher [DEP]

We have one more. In the nick of time.

1:50:11.770 --> 1:50:14.900

Andrejko, Judith [DEP]

Ally, Ally Peck, welcome back Ally.

1:50:15.480 --> 1:50:29.240

Ally Peck

My sorry, I just have a question on do you have a do you have an anticipated time frame on the next on another meeting or next time we're going to be together? OK.

1:50:24.210 --> 1:50:42.540

Mikulewicz, Christopher [DEP]

Come. We have not discussed meetings beyond today. We're trying to do it every other month, but don't quote me on that if it's more so as the rulemaking team deems necessary, so we likely won't be meeting again in February, but maybe again in March or April.

1:50:43.920 --> 1:50:44.720

Ally Peck

That's good. Thanks.

1:50:45.110 --> 1:50:48.810

Mikulewicz, Christopher [DEP]

Thank you. I think we are good to move forward.

1:50:49.470 --> 1:50:50.40

Andrejko, Judith [DEP]

Agreed.

1:50:55.840 --> 1:52:4.220

Mikulewicz, Christopher [DEP]

But alright, so moving forward to better inform the development of these of the compliance certification reports, the Department welcomes example recycled content calculations from manufacturers - doesn't have to be on specific products or like you know actual data just maybe fabricated data just to help us better understand how those how those calculations or what those calculations look like so that they can be incorporated into the compliance certification reports that would be very helpful for us. The example calculations will be examined for patterns to help the rulemaking team better understand what manufacturers can provide, which will be like which, as I said, will be incorporated into the compliance certification reports. And finally, for any questions or comments that were not covered today, please reach out to the e-mail on screen for further assistance that's recycledcontent@dep.nj.gov and someone will get back to you as soon as we can with a response. So now with that, I'm going to toss it back to Judy to close this out. I just want to thank everyone for your attention and participation today and I look forward to seeing everyone at our next meeting when and as I said that will be scheduled and sent out in the from the recycled content e-mail inbox to all of our attendees today. So thanks again.

1:52:4.820 --> 1:53:43.680

Andrejko, Judith [DEP]

All right, Christina, next slide. Just some additional information to have in the back of your pocket. We'd like to thank you again on behalf of the Department of Environmental Protection for your time your attention and your really good input today. We want to let you know that summaries of the topics that were covered at today's meeting and relevant information are going to be made available following the meeting at <https://www.nj.gov/dep/dshw/recycled-content/index.html>. For a division of sustainable weight sustainable waste management. Following the New Jersey Register publication of the Rule proposal, which would be in some time after we get done with the stakeholder ring when it's eventually published in the New Jersey Register for public

consumption, we will be accepting formal comments on the rules that could be made by anyone, by anyone in the viewing area for a period of 60 days and during that period we take both oral comments at a public hearing as well as written comments. And lastly, we would ask you to again direct your main questions via e-mail to recycledcontent@dep.nj.gov, which is listed here. Again, thank you everybody for joining us this afternoon we'll be seeing you again, keep an eye open and your e-mail inbox for your invitation for our next stakeholder meeting in the Recycled Content Series. Thank you.

1:53:45.950 --> 1:53:47.780

Mikulewicz, Christopher [DEP]

That concludes today's meeting. Thanks everyone.

1:53:48.350 --> 1:53:48.970

Viall, Susan

Thank you.