November 2, 2015

Mark Daniels American Progressive Bag Alliance 1425 K Street NW., Suite 500 Washington, DC 20005

Hon. Street 1 Street 2 City, State ZIP

Dear Council Member,

I'm Mark Daniels of NOVOLEX, a plastic bag manufacturer and recycler, and Chairman of the American Progressive Bag Alliance, a national trade association that seeks to educate on the facts about plastic bags.

It is disappointing to see that the Council is considering a plastic bag tax, particularly in a city where recycling – versus burdensome taxes – could go a long way. We believe that the root of this issue lies with New York City's refusal to invest in the machinery to recycle plastic bags.

As you know, Sims Recycling was designated as the city's recycling center and part of the City's landmark Solid Waste Management Plan, which establishes a cost-effective, equitable, and environmentally sound system for managing the City's waste for the next 20 years. Sims is also a key component of the City's effort to achieve PlaNYC's goals of improving air quality, cutting traffic and reducing greenhouse gas emissions.

However, Sims is not fully equipped with the basic machinery to recycle plastic bags. Sims has the foundational structure in place to expand their recycling capabilities to include plastic retail bags, wraps and films. The plastic bag industry is responsible for inventing this technology and has made tremendous strides to include all polyethylene films that were previously just sent to the landfill. Novolex's North Vernon, IN facility, for example, recycles more than 35 million pounds of plastic bags, wraps and film into new plastic bags each year.

In 2008, Mayor Bloomberg signed into law a mandate that requires City retailers to provide recycling collection bins for plastic retail bags, wraps and films. The following year, Governor Cuomo enacted New York State's Plastic Bag Reduction, Reuse and Recycling Act requiring the same measure at the state level. Recycling these items reduces waste and litter, resulting in cleaner streets and waterways and less material in landfills. Recycled plastic bags and film plastics provide valuable material to manufacturers of plastic lumber, plastic bags and other useful products.

If New York City were to expand its local recycling capabilities to include these 100% recyclable materials, it would be the first city to not only pass a law to mandate recycling, but to support it with local recycling infrastructure.

A preliminary project assessment conducted by the plastics and recycling industry indicates that an investment of \$3 Million would provide the New York City area recycling centers an initial capacity to profitably process 2,500 – 3,000 pounds per hour of plastic retail bags, or 18 million pounds per year (allowing for maintenance and other factors). The project is based on processing plastic retail bags collected in single stream curbside recycling programs in the area, not retail take-back programs. This system would yield resin that has a 10-year market value of more than 10 times the cost of the project and would also produce 10-20 middle class jobs that would be sustained by the project. Recycling of plastic retail bags in New York City would not only be a recycling and environmental success, but one that produces jobs and financial success as well.

The plastic retail bag recycling project assessment is based on a tour of the Sims recycling facility and consultation with national recycling leaders and equipment manufacturers. Their expertise indicates that the following equipment mix would produce a modular system capable of meeting the City's plastic retail bag recycling needs:

- Bale breaker
- Wet shred
- Dewater screw
- Wash screw, pre-wash/heavy material separation
- Wet granulator
- Frictional washer
- High performance separation unit (with hydrocyclone)
- Mechanical dryer
- Thermal dryer

The system will also require the following ancillary equipment:

- Conveying equipment and motors
- Mechanical water treatment, dissolved air floatation unit, recommended due to smaller footprint

The industry's preliminary scoping estimate includes rigging, installation support staff for training and start up. The estimated lead time would be five months. Currently there are six of these configurations operating the in the United States processing similar film grades, so technical support and experience is in abundance to support the project.

Lastly, if recyclability is such a key determent, lawmakers should acknowledge the adverse environmental impacts non-recyclable non-woven reusable bags have on New York City and the local infrastructure.

If you have any questions regarding the aforementioned, please contact me at (202) 974-5200 or by e-mail at Mark. Daniels@novolex.com. Thank you.

Sincerely, Mark Daniels American Progressive Bag Alliance