



*April 9, 2020*

Jared Blumenfeld  
Secretary  
California Environmental Protection Agency  
P.O. Box 2815  
Sacramento, CA 95812-2815

**Re: Importance of California's Beverage Container Deposit Program to Essential Supply & Manufacturing Operations**

Dear Secretary Blumenfeld,

On behalf of our industries and our member companies, we write to highlight the critical role California's beverage container deposit program plays in supporting essential manufacturing business operations.

Beverage container redemption programs, **including California's, provide critical inputs and feedstock for essential manufacturing businesses and their customers** (including food and beverage companies), as detailed in the guidance issued by the Department of Homeland Security's Cybersecurity and Infrastructure Agency (CISA) on March 28.

Additionally, the President issued updated Coronavirus Guidance for America on March 16. This guidance states that:

*"If you work in a critical infrastructure industry, as defined by the Department of Homeland Security, such as healthcare services and pharmaceutical and food supply, you have a special responsibility to maintain your normal work schedule."*

We ask that California consider the following, with respect to the beverage container deposit program:

1. Clear communication to consumers and all stakeholders that the beverage container redemption program has not been repealed and remains state law.
2. Consider publishing a list (preferably as an online resource) with updated information on return and/or redemption options, openings and any other changes that may be made.

We also ask for California's continued engagement with recycling and manufacturing supply chain industries regarding any future program operational changes, prior to implementation.

### **Recycled Materials as Part of the Essential Manufacturing Supply Chain**

To date, all issued local and state executive orders regarding essential businesses and shelter in place orders have recognized food and beverage manufacturing companies, along with their supply chain partners, as essential businesses and operations. This supply chain for food and beverage companies includes companies that collect, process and otherwise handle recyclables across the country.

Beverage container deposit systems generally account for 20-60% of our collective materials input batch, and California is a key beverage container deposit state. The high quality of recyclables collected and purchased by our industries from these beverage container deposit programs are generally unmatched, require very little sortation and can go quickly back into our manufacturing processes. Simply put, as our industries have ramped up production to meet unprecedented demand for packaged food and beverages, a strong, dependable supply chain of recycled material is essential.

### **Beverage Container Deposit Program Enforcement Changes and Clarity**

We understand the significant pressure on many of the retail and grocery outlets, as they keep pace with customer demand and at the same time protect the health of their workforce.

As organizations representing essential manufacturing companies that supply the food and beverage packaging sold by grocery and retail outlets, our member companies are also addressing and adjusting to these challenges, in adherence with all safety guidelines as issued by states and the federal government.

Our supply chain and manufacturing member companies rely on the high-quality recyclable materials provided by California's beverage container deposit program. Ensuring a steady flow of recyclable materials through all our supply chains will ensure we are able to support our food and beverage customers.

Thank you,

**Tom Dobbins**



President and CEO  
Aluminum Association

**Robert Budway**



President  
Can Manufacturers Institute

**Scott DeFife**



President  
Glass Packaging Institute

**Darrel Collier**



Executive Director  
National Association for PET  
Container Resources

Cc: Melissa Immel, Deputy Legislative Secretary & Chief of Legislative Operations,  
Office of the Governor  
Caroline Godkin, Deputy Secretary for Environmental Policy and Emergency  
Response, CalEPA  
Ken DaRosa, Acting Director, CalRecycle