



March 26, 2015

ASTM D20.95 Subcommittee Members

Attn: Tom Pecorini, D20.95.01 Section Chairman and Technical Contact

RE: Revision of D7611/D7611M-2013E1 Practice for Coding Plastic
Manufactured Articles for Resin Identification WK47078

Dear Dr. Pecorini,

The National Association for PET Container Resources (NAPCOR) is the trade association for the PET plastic packaging industry in the United States and Canada. Its members comprise the full PET value chain from resin, bottle sheet and thermoform manufacturers, to reclaimers and other providers of materials and services to the PET industry.

Founded in 1987, NAPCOR has been instrumental in developing domestic postconsumer PET collection and reclamation, with volumes of recycled PET growing more than 10 fold from 150 million pounds in 1987 to 1,798 million pounds in 2013. The PET industry has built its postconsumer bottle collection volumes over the years by asking consumers to “look for #1” on PET bottles and jars. Thus, while not intended as a recycling symbol, the “#1 PETE” resin identification code (RIC) designation has been a largely successful differentiator for recycling compatible PET to date.

The D7611 ballot guidance documents cite that the codes are intended to “... identify the significant variants within each resin family to better facilitate selection of end of life options.” For PET recycling, the difference in recommended and practiced drying procedures of PET and of PETG is a significant and irreconcilable variant that renders PETG and PET processing incompatible. Inclusion of PETG with PET in the recycling stream causes significant disruptions for NAPCOR’s PET reclaimer members. This incompatibility is not in dispute: even at very small fractions, PETG items processed with PET compromise the rPET material produced and clogs dryers, adding cost burden at multiple junctures. PETG represents a significant variant from the PET resin family and needs to be clearly distinguished as not of the PET resin family.

For these reasons NAPCOR opposes the inclusion of PETG with PET for the purpose of recycling PET, as well as any actions that might lead to or promote such inclusion, and finds no compelling rationale as to why the two materials should carry the same or similar resin identification codes numbers and letters. NAPCOR finds the use of the number 1 and PETE-NC for PETG to be unacceptable to the best interests PET plastic packaging industry and its stakeholders.

Sincerely,

Rick Moore
NAPCOR Executive Director