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●●● Innovative solutions for a sustainable future

September 12, 2023

Chad Nelsen, Ph.D.
Surfrider Foundation
PO Box 73550
San Clemente, CA 92673

Re: Request for Dialogue – Surfrider 2022 Beach Cleanup Report

Dear Dr. Nelsen:

Your recent Beach Cleanup Report contained great message points supporting the value of education and outreach, but also cuts in the opposite direction with some misinformation that will not advance the mission of clean oceans and beaches. No one wants litter.

The EPS Industry Alliance is the North American trade association for expanded polystyrene. Our members make building insulation, packaging, surfboard blanks, and many other products. We also facilitate EPS recycling and support recapture and recovery programs like Oregon's Plastic Pollution Prevention and Recycling Modernization Act, Canadian EPR programs, and are accredited participants in the United Nations Environmental Programme, Plastic Pollution Treaty negotiations.

We fully acknowledge that recycling EPS can be challenging. This is in part because it does not fit neatly into the co-mingled, single-stream services that are unfortunately the extent of most municipal commitments to resource recovery. However, in North America 65.6K tons of EPS transport packaging was collected for recycling in 2019 through take-back programs run by companies like Best Buy, more than 375 recycling drop-off locations, and 100+ curbside collection programs.

There are several misstated conclusions in the 2022 Beach Cleanup Report that would benefit from clarification. First, there is a distinct difference between the function and disposal of expanded polystyrene transport packaging and single-use polystyrene foam foodservice products. In this context, it may be important to understand there are many variations of polystyrene feedstock besides EPS. They include general purpose polystyrene (used to make rigid, durable goods), oriented strand polystyrene (clear clamshell containers), high-impact polystyrene (white, rigid containers), extruded foam polystyrene (thermoformed sheets used for foodservice products and building insulation) and expanded foam polystyrene (used for building insulation and packaging protection). These polymer formulations all have different manufacturing processes, performance properties and uses.

One of the conclusions stated in the Surfrider report is that EPS becomes 40x its size (page 23) due to the infusion of air which allows a very small amount of plastic to protect products during shipment in harsh distribution environments. The expansion process does increase volume, but it is the same amount of plastic. Our most recent life cycle inventory research report indicates EPS has lower greenhouse gas emissions than many alternative materials. In addition, EPS transport packaging is being widely recycled and bans will only

serve to cancel EPS recycling growth potential, especially since many alternative materials are not recycled to the same degree, e.g., expanded polypropylene.

We are currently working with the Cal-Poly school of packaging that is conducting a test program on various cushioning materials to determine the viability of substitutions and the subsequent environmental trade-offs. EPS-IA is also supporting policy that recognizes the important role of plastic in transport packaging, such as EPR, recycled content mandates, improved recycling labeling using QR codes, and the development of a packaging category rule that could facilitate the material selection process from an environmental standpoint.

We would greatly appreciate the opportunity for a meeting to discuss certain aspects of EPS that you may not be aware of and explore how we can reduce the volume of EPS material going to landfills or leaking into the environment without compromising product distribution and the additional environmental impacts that will result from increased damage. Bans may not be the answer and we would like to explore solutions with Surfrider, especially pertaining to beach litter, without the drastic measures implied by a material ban.

The Surfrider Foundation is advocating the power of engagement, discussion, information, knowledge, and the exponential opportunity that exists when we elevate awareness. EPS-IA would appreciate an audience in support of that intention. We plan to follow up sometime next week and are looking forward to a productive exchange of information, or you can contact me directly at (410) 212-9319.

Thank you, Betsy

EPS INDUSTRY ALLIANCE

A handwritten signature in black ink, appearing to read "Betsy Bowers", with a long horizontal flourish extending to the right.

Betsy Bowers, Executive Director