October 18, 2019

Adam Tauber, Assistant Director of Recycling  
Department of Resources Recycling and Recovery (CalRecycle)  
P.O. Box 4025  
Sacramento, CA 95812-4025

By email: DORWorkshops@calrecycle.ca.gov, Adam.Tauber@CalRecycle.ca.gov

Dear Mr. Tauber and DOR officials,

We are writing to state our support for modifying CCR §2200(b) to allow aluminum beverage can manufacturers to mark cans on either the top or the side of aluminum cans with CRV redemption information. We generally support the draft language that was provided in the powerpoint presentation at the workshop on September 18, 2019; however, we agree with others who commented that the marking should be on the side of the can only, not the bottom of the can. The bottom of the can is already used for sell-by dates and other critical information.

As you stated in your labeling workshop of 10/19, the increasing thinness of aluminum can lids has led to finer and finer CRV message imprints that have become harder for consumers to read. Increasing the visibility of the CRV message is likely to reduce consumer confusion, and could perhaps aid in bolstering the aluminum can redemption rate in California.

As you know, the redemption rate for aluminum cans in California has dropped from 98% in FY2013 to 83% in FY2018, a 15% decrease. While we cannot say with certainty that allowing more manufacturer flexibility in CRV labeling will lead to a higher can recycling rate, it does stand to reason that better visibility of the recycling message could encourage recycling.

Please contact me with any questions you may have.

Sincerely,

Susan Collins  
President, Container Recycling Institute

About the Container Recycling Institute: CRI is a nonprofit organization and a leading authority on the economic and environmental impacts of beverage containers and other consumer-product packaging