



NAN YA PLASTICS CORPORATION, AMERICA SOUTH CAROLINA PLANT

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Thank you for the opportunity to submit comments regarding the Commission's revisions of the Green Guides for recycled products within the textile industry.

Background:

Nan Ya Plastics Corporation America, South Carolina Plant is a manufacturer of polyester resin (chips) filament and staple fiber. The polyester products that we produce reach the consumer in many different forms. Our products are used to produce soda and water bottles, food packaging, apparel fabrics, automotive fabrics, carpet and many other everyday products.

The demand for our products are all consumer driven for a specific technical property, comfort, quality and increasingly environmental responsiveness.

Request for Comment:

Currently the definition of "recycled material" in the Green Guides requires that the material be "recovered or otherwise diverted from the solid waste stream" (i.e. landfill). The textile industry has worked very diligently through the years to prevent sending waste material from its manufacturing processes into the solid waste stream. Waste material typically has been collected and down-cycled to very low end use products. Capital investments have been made to reprocess this waste material so that it may be used in applications that would normally require virgin feedstock.

Comment:

We believe that the wording "recovered or otherwise diverted from the solid waste stream..." is very limited and not applicable to our industry since by-products / waste have already been diverted from the solid waste stream mainly into low end use products. Accordingly, we recommend that by-products / waste recovered in our manufacturing processes and reprocessed into products of equal or greater value than intended original products be considered "recycled".

We would be pleased to provide any additional information useful to the Commission on the merits of this approach.

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