



July 6, 2016

**TO:** The California State Transportation Agency  
California Environmental Protection Agency  
Natural Resources Agency  
California Air Resources Board  
California Department of Transportation  
California Energy Commission  
Governor's Office of Business and Economic Development

**FROM:** Tim Shestek  
American Chemistry Council

**RE:** Draft California Sustainable Freight Action Plan  
Appendix E: Packaging Optimization

On behalf of the American Chemistry Council (ACC)<sup>1</sup>, the national trade association representing the leading companies engaged in the business of chemistry, thank you for the opportunity to comment on the draft California Sustainable Freight Action Plan ("Plan"). Numerous industries, including agriculture, communications, defense, energy, health and medicine, technology and transportation use chemicals every day to ensure the safety of our water and food supply and enhance virtually every aspect of our lives. In fact, 96 percent of all manufactured goods are directly touched by the business of chemistry. To meet this constant demand, chemical manufacturers transport their products by variety of modes including rail, road and water. In California, the business of chemistry generates \$9.6 billion in payroll, directly employs nearly 77,000 workers, and generates nearly \$1 billion in state and local taxes.

ACC supports the objective of creating a more efficient and less resource intensive freight transport system. In fact, the products of chemistry play a key role in improving the environmental footprint of the transportation sector. For example, lighter weight materials have helped boost fuel efficiency and reduced emissions from cars and trucks. Many plastic components can weigh 50 percent less than similar components made from other materials.

The draft plan identifies several "discussion concepts" – including a focus on packaging optimization – for further exploration and potential action. (Appendix E: Discussion Concepts for Potential Future Action; C. Packaging Optimization, page E-1). ACC appreciates that the draft Plan recognizes advances in "smaller and lighter packaging," and the important role packaging plays in "protecting the commodity being shipped."

ACC would like to highlight the unique role plastics plays in packaging efficiency and overall resource conservation today. For decades plastics have driven innovation in packaging design and effectiveness. The evolution of plastic packaging has reduced the amount of energy needed to manufacture packaging and thereby reducing the amount of greenhouse gasses produced. Reducing initial resources conserves materials overall.

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<sup>1</sup> ACC members apply the science of chemistry to make innovative products and services that make people's lives better, healthier and safer. ACC is committed to improved environmental, health and safety performance through Responsible Care®, common sense advocacy designed to address major public policy issues, and health and environmental research and product testing.



Plastic packaging is durable, making it a preferred packaging choice for reusable items such as storage bins and sealable food containers. In industrial shipping, plastic pallets are impervious to moisture and most chemicals, allowing them to be used repeatedly. Furthermore, by preventing product waste during transport and distribution, plastic packaging prevents the waste from all the resources involved in product production – water, energy, fuels, metals, etc.

ACC appreciates the opportunity to submit these comments and welcomes further dialogue as the Plan is finalized and implemented. Should you have any questions or comments, please do not hesitate to contact me at 916-448-2581; [tim\\_shestek@americanchemistry.com](mailto:tim_shestek@americanchemistry.com).