



December 14, 2020

Mayor and City Council
City of Tucson
255 W Alameda Street
Tucson, AZ 85701

RE: Tucson, Arizona's Removal of Glass Recycling

Fiber glass insulation is a significant user of glass cullet in the Western United States.

NAIMA's members Owens Corning, Johns Manville, Knauf, and CertainTeed each have significant manufacturing capacity in the Western United States in: Santa Clara, CA; Willows, CA; Shasta Lake, CA; Chowchilla, CA; Nephi, UT; Salt Lake City, UT; and Kingman, AZ. These operations together employ approximately 913 workers, some represented by the Glass, Potters, and Molders Union, and provide approximately 1,338 (estimated) indirect employment opportunities in the Western United States. These operations have the capacity to manufacture residential insulation, commercial and industrial insulation, and many other types of fiber glass insulation products.

Since 1992, NAIMA has conducted an annual survey of member companies to determine the volume of glass cullet used by NAIMA's members. The most recent survey showed that in 2018, NAIMA's member companies in the United States used more than 2.2 billion pounds of recycled glass. The data for Canadian facilities showed that in 2018, 381 million pounds of recycled glass was used in the production of fiber glass insulation. That is a total of 2.6 billion pounds of recycled glass used in 2018.

Since 1992, when NAIMA started collecting recycled data, 61.8 billion pounds of recycled material have been diverted from the waste stream.

These numbers place fiber glass insulation as the second largest user of glass cullet in North America. Indeed, thousands of tons of glass cullet are used at the plants in the Western United States. Specifically, in 2019 alone, fiber glass insulation manufacturers used 371,567,636 pounds of glass cullet. The yearly average of these plants would be approximately 413,011,095 pounds. If Western states cease collecting waste glass, fiber glass manufacturers will likely have to ship glass cullet in from a different region.

Fiber glass insulation manufacturers are also the highest users of mixed bottle cullet (a mix of flint, amber, and green) and, as such, are responsible for recycling more of this material than any other source.

Fiber glass insulation manufacturers are committed to the use of glass cullet. Indeed, fiber glass insulation manufacturers, including the manufacturers in the Western United States, could use, in

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most situations, a higher percent of recycled content if it were available. Some are already using a very high recycled content but would need a steady supply to maintain that level of recycled content. That commitment to use cullet stems from some basic facts: 1) cullet is easier and more cost effective to melt; 2) the use of glass cullet saves energy, helps reduce emissions, and reduces production costs (so, recycling glass is really recycling energy); and 3) using glass cullet is an important product promotion feature and a key element to NAIMA and its members' sustainability story.

Without the current level of glass cullet being available throughout the Western United States, cost of production will likely increase, which will ultimately impact costs to the consumer.

Sincerely,



Angus E. Crane
Executive Vice President, General Counsel

Enclosed: NAIMA Western U.S. Impact

WESTERN UNITED STATES: GLASS CULLET

Fiber glass insulation manufacturers use recycled glass (cullet) in making insulation products that decrease the energy needed to heat and cool homes. Many of the manufacturers throughout the Western US **could use a higher percentage of recycled content** if it were available.

Without the current level of glass cullet being available throughout the Western US, **cost of production would likely increase**, which would likely impact consumers.

NAIMA and its members strongly urge state and local governments to **protect and expand the collection** of recyclable glass to support the sustainability of fiber glass products, which also **helps save energy and reduce pollution.**

NAIMA MEMBERS

NAIMA members **CertainTeed**, **Johns Manville**, **Knauf**, and **Owens Corning** have significant operations in the Western US in California and Utah. Many employees are represented by the United Steelworkers, Glass Molders and Potters Council.

CertainTeed



These operations together employ approximately

913 WORKERS

and provide approximately

1,338 INDIRECT EMPLOYMENT

opportunities throughout the Western US.



Pounds Of Recycled Glass Used By NAIMA MEMBERS to Manufacture Fiber glass Insulation

2.2 BILLION IN 2019

61.8 BILLION SINCE 1992

NORTH AMERICA: SECOND-LARGEST USER OF GLASS CULLET

Western US manufacturing facilities:

USED IN 2019:

371,567,636 million pounds



YEARLY AVERAGE WOULD EQUAL:

413,011,095 million pounds

HIGHEST USER: OF MIXED GLASS CULLET

Cullet is easier and more cost effective to melt



Saves energy, helps reduce emissions, and reduces production costs

In fact, using glass cullet is an **important product promotion feature** and a key element to NAIMA and its members' sustainability story.

NAIMA is the association for North American manufacturers of fiber glass, rock wool, and slag wool insulation products. Its role is to promote energy efficiency and environmental preservation through the use of fiber glass, rock wool, and slag wool insulation, and to encourage the safe production and use of these materials. Through the **Insulation Institute™**, we leverage the collective insulation expertise of our organization and our members to empower homeowners and professionals to make informed insulation choices.

NAIMA

NORTH AMERICAN INSULATION
MANUFACTURERS ASSOCIATION

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