



September 9, 2020

University of California Los Angeles
731 Charles E Young Dr S
Los Angeles, Ca. 90095

Subject: Bioplastics – Not Compostable!

Dear University of California Los Angeles,

This notification is on behalf of our compost facility American Organics in Victorville, California.

Athens Services has been providing organics collection and composting services for UCLA for many years. Athens Services collects organic and green waste material from UCLA and transports it to our Material Recycling Facility (MRF) in the City of Industry. Once the material is delivered to our MRF, it is sorted and transported in our 20 ton transfer trailers, to American Organics for composting.

Over the past few years, we have been working to improve our composting process and increase our capacity at American Organics, to prepare for the large increase in organics under AB 1826 and SB 1383. We embarked on a massive reconstruction of our facility, which was partially funded through a grant from CalRecycle. Our new and improved compost facility has decreased our first phase of the composting process from 90 days to 30 days. We are now able to accept more organic material and compost that material more quickly. We are proud of this accomplishment, as it will provide the capacity and infrastructure needed for all of our customers in Southern California. American Organics Compost is Certified Organic by the California Department of Food & Agriculture and is also OMRI certified assuring that it can be utilized by Organic growing operations. We are a member of the United State Compost Council and maintain certification using their authorized third party facility for laboratory analysis and testing. American Organics currently ships 90% of their finished material, compost, to large agricultural growers and farming operations.

Pursuant to the above our compost is Certified Organic and OMRI certified. BPI/Compostable plastics are not considered an Organic input by the California Department of Agriculture nor OMRI and therefore we cannot accept them and have a marketable Organic Compost. Also, due to our enhanced composting process, we have determined that bio-plastics are a product that cannot be composted as part of our process. Not all certified compostable items will actually compost and breakdown as fully or quickly as needed. Green waste, grass clippings, food waste, fiber, soiled paper and cardboard all convert to compost and breakdown quickly in any composting operation, but bio-plastics take much longer, and in some cases, do not always compost. Some studies have shown that these materials take up to 3 times as long to breakdown in the same process. This means a composter would need to wait 3 times longer to finish composting other feedstock while the bio-plastics decompose. In theory, this would mean a composting facility would need to triple their capacity and their space.



Again, not all certified items will actually compost. This is because certification standards are developed and tested in laboratory conditions. Those laboratories do not always replicate real world facilities or conditions, meaning the material does not always compost. The result is a finished compost that is contaminated with flakes of plastic. CalRecycle has established stringent standards regarding contamination in finished compost material, and those standards are difficult to meet when accepting bio-plastics.

Bio-plastics are not certified organic input. They must be removed if any composter desires to market their material as OMRI or CDFA certified.

COMPOSTABLE PACKAGING

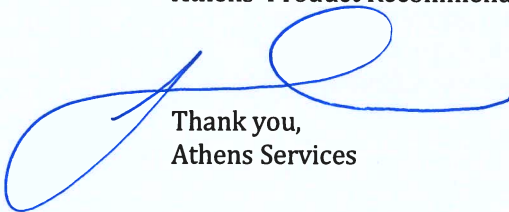
- 1. What if the packaging says one of the following words: “compostable, BPI Certified Compostable, Green Seal, and/or Cedar Grove certified,” but is still includes or is made, coated, or lined with bio-plastic.**
 - a. Just because something is certified compostable does not mean it will break down in the time required or is acceptable in most high-heat compost facilities, including American Organics. Please refer to Athens’ document “**Single Use Disposables Product Recommendations**” for more information. Athens does not accept any bio-plastics in their compost.
 - b. Green Seal does not certify items to be compostable.
 - c. Cedar Grove is a facility that BPI uses to certify compostability. Cedar Grove certifies that bio-plastic will compost in their process, however Athens will not accept bio-plastics.
 - d. We recommend that our customer use 100% fiber-based compostable items that are BPI certified and have no liner, coating, and/or filler that is bio-plastic and/or petroleum based.

- 2. What about PFAs/fluorinated chemicals in 100% fiber based compostables?**
 - a. Fiber-based items have historically contained PFAs/fluorinated chemicals as a grease barrier. However, in order to meet 2019 BPI certification standards, compostable products cannot contain more than 100 ppm of PFAs. This is why Athens encourages that all 100% fiber-based material be BPI certified.

Athens Services would like to transition and discontinue the acceptance of bio-plastics in the next 6 months.

Please see following section:

Athens’ Product Recommendation for Single-Use Disposable Serving-Ware



Thank you,
Athens Services



Athens' Product Recommendation for Single-Use Disposable Serving-Ware

As your recycling and organics collector and processor, Athens Services has the following recommendations regarding **single-use disposable serving-ware** that will enhance our ability to divert these items from landfills (based on overall recycling markets, technology capabilities, and product lifecycle as of 9/10/2018). Please read the following prior to any purchases.

First Consider Reusables: First and foremost, Athens encourages the use of reusable serving-ware wherever possible, especially for hard to recycle, single-use disposable products. The Oakland based, nonprofit Clean Water Fund operates a program called ReThink Disposables; they help businesses convert to reusable serving-ware by assessing financial savings, optimal material, and necessary training. They are collaborating with the Southern California based nonprofit, The Bay Foundation, to expand their services locally. For more information, please visit: www.rethinkdisposable.org and www.santamonibabay.org.

WHEN PURCHASING COMPOSTABLE-WARE

- **Choose 100% Plant-Fiber Based:** Although Athens recommends recyclable plastic choices first, if the client wants to purchase compostable-ware products, we recommend unbleached 100% plant-fiber based (with no plastic, wax, or bio-plastic coating/liner) that is BPI (Biodegradable Products Institute) certified. 100% plant-fiber based product should be placed in the organics container and are not recyclable.

Non-Acceptable Plant-Fiber:

- Do not place rags, clothing, or other cloth/textiles in the organics container for purpose of composting; "plant-fiber" means paper, not textiles.
- Athens' does NOT accept bio-solids or bathroom waste for composting, including tissues or bathroom paper towels.
- **Know that compostable bio-plastics are not recommended.** Bio-plastics are plant-based products or container coatings that look like plastic. **Bio-plastics should be disposed of in Athens' landfill containers, unless directed otherwise.** If the client chooses to purchase bio-plastic products,

Athens recommends those that have been BPI certified. California state law prohibits the marketing of any plastic or bio-plastic like material as "bio-degradable;" avoid products marketed as such. Athens is unable to offer compostability testing for these products.

- **Check with Your Suppliers First:** In order to save money and time, prior to purchasing single-use disposables, we encourage clients to first check with their suppliers to confirm BPI certification and 100% fiber-based standards.
- **Consider Where It Will Be Disposed:** Compostable serving-ware product is optimal for businesses that collect the items onsite and have enlisted in Athens' organics collection service. Just because a business provides compostable take-out containers, it does not mean customers have access at their home or place of work to the appropriate receptacle for organics collection and processing. The 100% plant-fiber based items can breakdown in backyard composting. Bio-plastics must be processed in a high-heat compost facility, however if the waste service provider does not accept bio-plastics these items must be placed in the landfill container. **Bio-plastics and plant-fiber based compostables should NOT be placed in curbside recycling and/or Athens' recycling containers.**



Athens will take food-soiled paper in the organics container, if the following is adhered to:

- Must be 100% plant-fiber based with no plastic, wax, or bio-plastic coating/liner.
- Must be food-soiled **ONLY** with food and/or drink liquids.
- **Do NOT place in organics container:**
 - Paper soiled with cleaning chemicals, hazardous waste, hygiene products, bio-solids, animal waste, and/or any non-food related liquids.
 - Bathroom waste, including tissues or bathroom paper towels.
 - Bioplastics - plastic-like material made solely from plants.
 - Unused or unsoiled paper. Clients cannot dispose of unused napkins, paper towels, plates, cups, or other fiber serving-ware in the organics container as a means of disposal. If the client wants to dispose of these materials (instead of using them first), the items must be placed in the landfill container. These paper items are not recyclable due to content type.

Athens Services is here to help you and your business implement zero waste programs and increase your diversion efforts. If you need further assistance, please contact your Account Manager.