Formal Response from The Dow Chemical Company
to the Hefty (dirty) Energy Bag Campaign

We formally reached out to a representative of Dow Chemical with our concerns about the Hefty Energy Bag program. They chose not to answer our questions directly despite repeated requests, and instead provided us with a statement. You will find our questions and their statement below.

Our questions:

1. We've seen that the Hefty Energy Bag program has been marketed as "recycling," which goes directly against the National Recycling Coalition's definition of recycling (which specifically excludes incineration). We are concerned that the labeling of this program as "recycling" is misleading the public.

2. This program fails to address international calls for reduction but instead allows for continued/increased production of single-use plastics. In fact, it seems that DOW is planning on increasing its plastic production in the coming decades. How would DOW respond to concerns that the Hefty Energy Bag program will distract consumers from a reduction message, the top pillar of the waste hierarchy?

3. Our members are concerned about the environmental health impacts of burning plastic in cement kilns, which can result in toxic emissions.

4. Is DOW planning to expand the Hefty Energy Bag program to 50 more sites in the next five years? What is DOW's timeline for transitioning from burning waste sourced from energy bags in cement kilns to solely using chemical recycling technologies, as DOW has claimed will be the ultimate end goal of the program?

Response from Jennifer Varadi
Business Communications
Dow Packaging and Specialty Plastics
The Dow Chemical Company

At Dow, we are dedicated to sustainability through policies and programs that advance the "circular economy" for plastics – an important focus of our 2025 sustainability goals.

Dow has a vital interest and responsibility in making plastic materials beneficial throughout their lifecycle. We are committed to working to improve the entire system where our products are
used in order to maximize the benefits derived from using our products and maximize resource efficiency.

In addition to the many other initiatives we have to improve the lifecycle of our products, the Hefty® EnergyBag™ program could achieve positive long-term environmental and economic advantages and a solution for plastics that currently cannot be mechanically recycled, including fewer tons of landfill trash, more energy resources and less dependence on fossil fuel energy. Dow and the plastics industry are working to increase the recycling of more valuable plastic packaging and materials. The Hefty® EnergyBag™ program complements existing recycling programs and can help remove otherwise contaminated material from materials recovery facilities (MRFs), thereby improving the overall recycling efficiency.

We are committed to ensuring the health and well-being of the communities participating in our programs. Risk assessments have shown that the regulated use of co-processed materials as fuel in cement kilns poses no increased risk to human health and the environment. All cement plant emissions in the U.S. are regulated under the Clean Air Act (CAA) in addition to any local air quality requirements that protect human health and the environment. Further, all energy recovery facilities that are approved to receive Hefty® EnergyBag® program materials must undergo a strict vetting process, which includes an assessment of environmental compliance and permits, air pollution controls, facility operational practices, and more.

Dow strives to provide information and education to the public about the Hefty® EnergyBag™ program in a clear, succinct and consistent manner. We appreciate you bringing to our attention references to the initiative as a recycling program. We will review our communications to ensure that we are giving the public an accurate description of how the initiative is complementary to existing mechanical recycling programs.

Again, thank you for your time and interest in our program. This is a collaborative effort and we appreciate you reaching out to us.