

Date : 10/7/2022 9:00:09 AM  
From : "James Curran"  
To : "Ashley Dougherty"  
Subject : FW: Carpet EPR Definition  
Attachment : image002.png;image003.png;image001.png;

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Hi Ashley- looking forward to talking later. Just wanted to bump this back in your inbox to give you an idea of what we're looking for. Hoping to talk packaging EPR as well. Thanks!

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**From:** James Curran <jcurran@BrownWeinraub.com>  
**Date:** Monday, July 25, 2022 at 12:28 PM  
**To:** Ashley Dougherty <Ashley.Dougherty@exec.ny.gov>  
**Subject:** Re: Carpet EPR Definition

Hey Ashley- I wanted to share an updated definition Eastman put together based more closely on what California recently enacted.

(1) ♻️ Recycle or ♻️ recycling means the process of collecting, sorting, cleansing, and treating materials that would otherwise be disposed of on land or in the water or atmosphere, for the purpose of returning them to, or maintaining them within, the economic mainstream in the form of recovered materials or raw materials to be used to manufacture or produce new products.

(2) ♻️ Recycle or ♻️ recycling does not include any of the following:

- (A) Incineration or combustion for disposal,
- (B) Energy generation,
- (C) Fuel production, or
- (D) Other forms of disposal.

(3) The department shall adopt regulations to encourage recycling that minimizes the generation of hazardous waste and greenhouse gases, environmental impacts, environmental justice impacts, and public health impacts.

Happy to answer any questions you might have on this. Also, curious if you've gotten any feedback from either house? We're happy to try and bring them along, I just don't want to get out ahead of you on any conversations you're having. Let me know.

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**From:** Ashley Dougherty <Ashley.Dougherty@exec.ny.gov>  
**Date:** Wednesday, June 29, 2022 at 1:40 PM  
**To:** James Curran <jcurran@BrownWeinraub.com>  
**Subject:** Re: Carpet EPR Definition

Thanks for sharing!

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**From:** James Curran <jcurran@BrownWeinraub.com>  
**Sent:** Wednesday, June 29, 2022 1:37 PM  
**To:** Ashley Dougherty <Ashley.Dougherty@exec.ny.gov>  
**Subject:** FW: Carpet EPR Definition

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Hey- we're set to talk on Friday, but I wanted to share this in advance of our conversation. Hope you're well and enjoying life post session.

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**From:** Turnock, Kierstin Marissa <KierstinM.Turnock@eastman.com>  
**Date:** Tuesday, June 21, 2022 at 8:08 AM  
**To:** James Curran <jcurran@BrownWeinraub.com>, Molly Marcy <MMarcy@brownweinraub.com>  
**Cc:** Perry, Brent J. <bperry@eastman.com>, Poe, Charley <cpoe@eastman.com>  
**Subject:** Carpet EPR Definition

Hey Team,

Sorry for the delay on this 📧 craziness in California! Below is the definition we 📧d like to send to the executive re: carpet EPR 📧

**"Recycling"** means reprocessing, by means of a manufacturing process, of a used material into a product, a component incorporated into a product, or a secondary (recycled) raw material. "Recycling", for purposes of this title, does not include energy recovery or energy generation by means of combustion, use as a fuel, or landfill disposal of discarded covered materials or products or discarded product component materials or chemical conversion processes for the creation of or use as fuel, as determined by the department to not qualify in the state as recycling. 📧 Recycling 📧 shall include manufacturing processes that result in the material's net environmental impact into a product being less than the equivalent material produced relying on virgin fossil fuel-based raw materials, as determined by the department relying on tools including but not limited to the product's life-cycle analysis.

This is very similar to the definition we proposed for packaging EPR and is a principles-based definition.

**Kierstin Turnock | Eastman Chemical Company**  
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