



July 31, 2023

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US Environmental Protection Agency (EPA)
1200 Pennsylvania Avenue NW, Washington, DC 20004

Submitted electronically via Regulations.gov

**RE: Draft National Strategy to Prevent Plastic Pollution: Request for Public Comment;
Docket Number EPA-HQ-OLEM-2023-0228**

The Consumer Brands Association (“Consumer Brands”) is pleased to provide comments in response to the Environmental Protection Agency’s (“EPA” or “Agency”) request for public comment on the Draft National Strategy to Prevent Plastic Pollution (“Strategy”).

Consumer Brands is the trade association representing the consumer-packaged goods (“CPG”) industry. Consumer Brands champions the industry whose products Americans depend on every day, representing more than 2,000 iconic brands. From household and personal care products to food and beverage products, the CPG industry contributes \$2 trillion to the U.S. GDP and supports more than 20 million American jobs. Our industry is dedicated to empowering consumers to make informed decisions about the products they use in their homes – on average, 42 products per day – and feels a unique responsibility to reduce plastic waste in the environment and create a circular economy with sustainable packaging solutions.

Consumer Brands and its members are committed to assisting the EPA in its mission to protect human health and the environment. The CPG industry plays a crucial role in creating a more sustainable future through its products and is prioritizing sustainable developments in packaging and recycling innovation. For instance, all of the 25 largest CPG companies in the United States have made commitments to increasing recyclable content, source reducing packaging, or incorporating reuse of material.¹ Eighty percent of those companies are working toward introducing fully recyclable packaging for all of their products by 2030 at the latest.

Consumer Brands commends the EPA for identifying and undertaking the actions presented in the Draft National Strategy to Prevent Plastic Pollution. We are eager for its implementation alongside the goals established by the National Recycling Strategy. We look forward to continued dialogue with the Agency, and welcome opportunities to assist EPA with the implementation of these Strategies. Our comments and recommendation on the questions posed in the Agency’s proposed Strategy are provided below:

¹ “Creating a Sustainable Future, through Increasing Recyclability and Reimagining the Recycling System.,” Consumer Brands Association, November 11, 2021, <https://consumerbrandsassociation.org/sustainability/>.



I. What actions can best protect human health and environmental quality?

A.) Research the efficacy and safety of post-consumer recycled materials in food packaging

Regarding strategy goal A2.1, we recommend directing the EPA to increase the availability of health, safety, and environmental impact data on plastic products commonly used by consumers. In particular, EPA should include the collection of data on the use of post-consumer recycled content (“PCR”) in food packaging. We encourage the EPA to work in partnership with other federal agencies, including the U.S. Food and Drug Administration, to analyze the safety of PCR for use in food packaging. Four states, Washington, New Jersey, Maine, and California have enacted recycled content laws that mandate minimum incorporation of PCR in certain categories of consumer product packaging. State extended producer responsibility legislation, including the program established by California Senate Bill 54, feature source reduction requirements for producers.² Use of PCR content is a tool increasingly relied upon by producers to meet state level source reduction requirements as well as their own self determined targets. As discussed, the CPG industry has made unprecedented commitments to improving the recyclability and sustainability of its products and the use of PCR material is an important tool in advancing these goals. However, as the use of PCR content has increased, so should the review of its application and safety in food packaging. It is essential that the EPA coordinate its work alongside the FDA to expeditiously collect, review, and publish data analyzing the safe conditions of use, limitations, and availability of food grade PCR materials, including an analysis of existing infrastructure and supply chain needs.

B.) Review plastic resin identification codes

We are supportive of the Draft National Strategy action B5.3 to assess the impact of plastic resin identification codes that use “chasing arrows” on consumer confusion, as well as whether the current resin identification codes are adequately suited to meeting the objectives of the Draft National Strategy. Resin identification codes (RIC) that use chasing arrows, created for use at recycling processing centers, are overwhelmingly interpreted as providing recycling guidance to consumers. When surveyed, 92% of Americans did not understand the purpose of resin identification codes. Sixty eight percent reported assuming that any product with the symbol for all seven codes would be recyclable, while the other 24% simply reported not knowing.³ The problem is compounded by diverse state legislation regarding the resin identification code. The use of the RIC on certain types of packaging is required by law in 39 states, and some of these states explicitly require the RIC to appear within a chasing arrows symbol (as opposed to incorporating the ASTM standard of a solid equilateral triangle by reference). Meanwhile, California’s Senate Bill 343 prohibits the use of the RIC within a chasing arrows symbol, even in an inconspicuous location, unless the product meets California’s definition of “recyclable.”⁴

² See Plastic Pollution Prevention and Packaging Producer Responsibility Act (2022) <https://calrecycle.ca.gov/packaging/packaging-epr/>

³ “Reduce, Reuse, Confuse” Consumer Brands Association, 2019, https://consumerbrandsassociation.org/wp-content/uploads/2019/04/ConsumerBrands_ReduceReuseConfuse.pdf.

⁴ California Senate Bill, SB-343 Environmental advertising: recycling symbol: recyclability: products and packaging § (2021), https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220SB343.



Notably, the law’s restrictions on use of the chasing arrow symbol may affect not only the RIC, but also use of the chasing arrows symbol to convey recycled content. Similarly, the use of RIC 7 as a catchall for resins not identified by RICs 1–6 without further definition or standardization does not contribute to recycling efforts and frustrates those efforts by exacerbating potential consumer confusion. Effectively utilizing public education on the use of resin identification codes to provide clarity is obstructed by inconsistent and even contradictory state legislative requirements around resin codes. Changes are needed to increase clarity regarding the recyclability of plastic products, and we encourage the Agency to utilize B5.3 to address the problem created by resin identification codes that explicitly mandate the use of chasing arrows as opposed to incorporating by reference the ASTM standard.⁵

II. What are the key steps and milestones necessary to successfully implement the actions in the draft strategy?

A.) Build out implementation of the National Recycling Strategy

We recommend the Agency prioritize development of actions identified in its National Recycling Strategy alongside its implementation of the Draft National Strategy to Prevent Plastic Pollution.⁶ Goals identified by the National Recycling Strategy are crucial to the success of targets in the new draft Strategy. For example, target 2.5 in the National Recycling Strategy directs the Agency to develop and implement national recycling strategy definitions, measures, targets, and performance indicators.⁷ Achieving this milestone set by the National Recycling Strategy would support the fulfillment of Objectives B and C in the new Strategy by providing increased clarity and standardization.

The EPA estimated that only 8.7% of plastic waste is currently recycled.⁸ Standardizing recycling definitions, measures, targets, and performance indicators will support effective consumer recycling education on a national level, and combat consumer confusion, thus enabling an effective recycling system. Conversely, a lack of standardization and a consistent use of recycling definitions presents challenges for consumers and companies amid differing systems. Foundational to a definition of the term “recyclable” is that it conveys the capacity of a material to be recycled versus a determination that it ultimately will be recycled.⁹

III. What are the most important roles and/or actions for federal agencies to lead?

⁵See *Standard Practice for Coding Plastic Manufactured Articles for Resin Identification*, [D7611/D7611M Standard Practice for Coding Plastic Manufactured Articles for Resin Identification \(astm.org\)](https://www.astm.org/standards/D7611)

⁶“National Recycling Strategy,” EPA, November 2022, <https://www.epa.gov/circulareconomy/national-recycling-strategy-part-one-series-building-circular-economy-join-effort>.

⁷ *Ibid.*

⁸“Plastics: Material-Specific Data,” EPA, April 2023, <https://www.epa.gov/facts-and-figures-about-materials-waste-and-recycling/plastics-material-specific-data>.

⁹ See *Curtis v. 7-Eleven, Inc.*, 2022 WL 4182384, at *13 (“‘Recyclable’ simply means that the product is capable of being recycled. It is about product itself, meaning its intrinsic character.”); see also *id.* at *16 (“And here, recyclable . . . means ‘can be recycled.’”); see also *Swartz et al. v. The Coca-Cola Company*, 2022 WL 17881771, at *1 (“In everyday usage, ‘recyclable’ is an adjective that means capable of being recycled.”).



A.) Promote harmonization across sustainability initiatives and requirements

Harmonization of sustainability initiatives across varying regulatory bodies is an essential role for federal agencies, especially the EPA, to assume. Consumers agree; in a study conducted by Consumer Brands, 83% of respondents believed that tackling plastic and packaging waste is an opportunity for the federal government to lead.¹⁰ Sustainability is an increasingly researched and regulated field- there are global initiatives such as the United Nations Plastic's Treaty, federal agency actions such as the update of the Federal Trade Commission's Guides for the Use of Environmental Marketing Claims ("Green Guides"), and state legislation requiring the use of recycled content and producer responsibility. These diverse actions addressing sustainability have similar goals, but often vastly different plans for execution. For example, state extended producer responsibility programs, while intended to achieve the same goal, have divergent requirements. This includes variance in the structure of producer participation, level of state environmental agency engagement, types of materials accepted by the recycling program, cost to consumers, and many other factors. The existing patchwork of standards and requirements inhibits the success of the United States recycling system. We believe the EPA is best suited to lead harmonization across sustainability actions, to promote nationally coordinated polices which are cohesive with global actions.

B.) Identify and remedy barriers to plastics circularity present in federal laws and guidance

As research advances in evaluating the use of post-consumer recycled content in product packaging, it is essential that pre-existing laws and guidance are reviewed to ensure they are conducive to its use in the marketplace. Post-consumer recycled content promotes improved circularity of plastics and should be supported and bolstered by federal government action. Currently, significant barriers to the incorporation of PCR into product packaging are present in outdated policy and guidance at the federal level. For example, guidance issued by the FDA in 1999 prohibits the use of post-consumer recycled content in primary drug packaging.¹¹ FDA also issued guidance on the use of recycled plastics in food packaging in 2006.¹² Recycling technology has advanced significantly since this guidance was published, including innovations which reduce contamination in recycling streams, such as optical sortation technology and use of chemical processes that significantly mitigate the presence of contaminants. Federal agencies, especially the EPA, should coordinate in the review of applicable laws and guidance to ensure policies are commensurate with modern technology, research, and standards. It is crucial that barriers to the use of PCR and other tools which bolster the circularity of plastics are identified and remedied.

C.) Collaborate in FTC review of sustainability claims in "Green Guides" update

¹⁰ "Launching America's Recycling Moonshot," Consumer Brands Association, November 12, 2019, https://consumerbrandsassociation.org/wp-content/uploads/2019/11/ConsumerBrands_RecyclingMoonShot.pdf.

¹¹ "Guidance for Industry - Container Closure Systems for Packaging Human Drugs and Biologics," US Department of Health and Human Services Food and Drug Administration, May 1999, <https://www.fda.gov/media/70788/download>.

¹² Guidance for Industry: Use of Recycled Plastics in Food Packaging (Chemistry Considerations); August 2006. <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/guidance-industry-userecycled-plastics-food-packaging-chemistry-considerations>



We recommend collaboration with the Federal Trade Commission (FTC) around the use of product sustainability claims. Action A2.2 of the Draft National Strategy directs a review of ecolabeling and other product certifications, which coincides with the Federal Trade Commission’s review of its Green Guides.¹³ We suggest that the EPA collaborate with the FTC on areas of overlap regarding the Green Guides. The EPA is well positioned to inform sustainability labeling and claims standards established by the Guides and ensure that definitions for environmental marketing practices are in alignment. Additionally, action B3.5 of the Draft National Strategy discusses the EPA evaluating degradability claims, utilizing the FTC “truth in labeling” efforts addressed in the Guides. Given that the Guides are currently under review, it is essential the EPA coordinates this action with the FTC so that developments do not become obsolete or contradictory. We suggest the EPA use its evaluation of claims regarding the degradability of plastic products to inform potential updates to the FTC Green Guides, thereby promoting accuracy in the use of the claim and consistency across federal agencies. At the same time, EPA should avoid seeking to impose overly prescriptive or unrealistic requirements that impede progress toward achieving a circular economy.

IV. Is your organization willing to lead an action or collaborate with others to implement actions?

A.) Consumer Brands welcomes the opportunity to interface with EPA and other stakeholders

The Consumer Brands Association would be willing to lead actions identified in the Strategy, as well as collaborate with others in their implementation. Consumer Brands and its members prioritize improving the United States recycling system and creating innovative packaging solutions. Few industries adapt as quickly to consumer demands as the CPG industry, and our members have made unprecedented commitments to the improvement of packaging design, source reduction, and the incorporation of recycled content. Consumer Brands is continually exploring new avenues for partnership and collaboration to support and promote the achievement of our members’ sustainability goals. For example, we previously engaged stakeholders to develop a blueprint to identify long term solutions to increase packaging sustainability and reduce waste nationally.¹⁴ Consumer Brands is also utilizing industry collaboration to directly improve the effectiveness of the U.S. recycling system. We have established a partnership with other industry organizations to integrate the Recycle Check functionality within our SmartLabel® program.¹⁵ SmartLabel® is a consumer transparency tool; the program utilizes an on-pack QR code to provide

¹³ See *Environmentally Friendly Products: FTC’s Green Guides*, <https://www.ftc.gov/news-events/topics/truth-advertising/green-guides>

¹⁴ “Blueprint for America’s Recycling System,” Consumer Brands Association, February 14, 2022, <https://consumerbrandsassociation.org/sustainability/recycling-leadership-council/blueprint-for-americas-recycling-system/>.

¹⁵ “The Recycling Partnership Launches Recycle Check, a New Dynamic Labeling Platform Delivering Clear, Local Recycling Information to U.S. Consumers,” Waste Dive, May 24, 2023, <https://www.wastedive.com/press-release/20230524-the-recycling-partnership-launches-recycle-check-a-new-dynamic-labeling-pl/>.



consumers with information beyond what would generally fit on a product package.¹⁶ This includes in-depth ingredient information, product certifications, and information on product sourcing. SmartLabel® will now interface with the Recycle Check program to provide localized recycling information. Consumers can input their zip code into the SmartLabel® system to find recycling instructions for the product, based on their location. We welcome additional opportunities to work alongside other stakeholder groups and the Agency in achieving and promoting Strategy goals.

- V. *What are potential unintended consequences of the proposed actions that could impact communities considered overburdened or vulnerable, such as shifts in production or management methods?*

A.) Actions need to prevent harmful disruption to specialized food product supply chains

Specialized food products can be essential in meeting the nutritional requirements of vulnerable populations, such as infants, young children, individuals with illnesses, and the elderly. FDA regulations delineate distinctive nutrition categories for specialized food products, including infant formulas, medical foods, and foods for special dietary use (ex. oral nutrition supplements). Sustainability policies and actions must take into account the potential impact on the accessibility of these specialized food products. Specialized food products have additional, important packaging considerations which limit the flexibility of product packaging alterations. Further research must occur to identify safe sustainable packaging options for specialized food products. Multilayer containers must withstand processing and heat treatment conditions, while maintaining product integrity and nutrient levels throughout the product shelf life. These multilayer containers cannot be part of a closed-loop recycling process and are limited in their ability to use post-consumer recycled content due to material instability, potential contaminant migration, and lack of approval for safe food contact use. Securing market access to specialized food products is essential, and packaging sustainability policies need to include appropriate exemptions for specialized food products to prevent disruptions in access for vulnerable populations. It is also worth EPA's consideration that many household cleaning and other CPG products have unique requirements as well. For instance, both the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and the Department of Transportation have specified packaging requirements for CPG products that must be accounted for when considering packaging innovation and sustainability practices.

- VI. *What criteria should processes other than mechanical recycling meet to be considered “recycling activities” (e.g., “plastics-to-plastics outputs are ‘recycling’ if the output is a product that could again be recycled into another product or to extent that it can achieve viable feedstock for new plastic materials”)? How should health and environmental impacts be considered in these criteria?*

A.) Necessary criteria to qualify as “recycling” should be inclusive of new technology

¹⁶ See Consumers want information. SmartLabel delivers. <https://consumerbrandsassociation.org/about-us/smartlabel/>



The criteria by which EPA defines recycling processes should be broad enough to encompass developments in recycling technologies, such as molecular recycling, reuse, and refill systems. Molecular recycling is a new entrant on the recycling landscape that offers great promise by providing plastic-to-plastic recycling options for a variety of difficult-to-recycle materials, including low-density plastics such as plastic films and flexible plastics. Molecular recycling includes dissolution recycling, depolymerization, gasification, and pyrolysis. The technologies that fall within this category are proven effective, many are already in operation at commercial scale, and numerous companies have announced plans for additional projects.¹⁷ During the molecular recycling process, the waste plastic is reduced to the molecular level and built back up into new plastic. As a result, there is no plastic degradation in the new product, allowing the molecules to be reused infinitely in place of virgin raw materials.

The CPG industry and Consumer Brands are strong proponents for prioritizing effective mechanical recycling across the United States. However, mechanical recycling alone is incapable of achieving targets set by mandatory and voluntary recycling initiatives or providing enough sufficient quality material for specialized packaging applications highlighted earlier; currently, there is only enough post-consumer recycled material to meet 6% of existing demand.¹⁸ Molecular recycling is a supplementary process capable of improving the circularity of plastic materials unable to be recycled by traditional, mechanical processes. Mechanical recycling can effectively sort some plastic polymers, such as HDPE and PET, but is unable to address other categories of plastic waste.

Mechanical recycling and emerging technologies can be used in collaboration to support achievement of circularity for plastic packaging. Some resin types are already capable of being managed through mechanical recycling, such as PET and HDPE. Resin types like PET and HDPE have a strong track record of high recycling rates, efficiently fit into existing mechanical recycling infrastructure, and are valuable recycled commodities. The circularity of other plastics like film, is increasingly feasible with tools like molecular recycling becoming commercially available. There is existing demand for recycled plastic content and with the incorporation of emerging technologies to mitigate the more difficult types of plastic to recycle, significant opportunity exists to preserve the value and functional capabilities of plastic packaging, while reaching sustainability goals.

Criteria utilized to designate processes as “recycling activities” should be conducive to the development of new technologies capable of improving upon material circularity. We encourage the EPA to also consider in its criteria, a definition inclusive of business models for reusability that have developed and to support the ability of brands to innovate and deploy new products that are

¹⁷ Janna Brancolini, “Chemical Recycling Could Bolster Sustainable Packaging,” Bloomberg Law, October 23, 2019, <https://news.bloomberglaw.com/environment-and-energy/chemical-recycling-could-bolster-sustainable-packaging>.

¹⁸ “Achieving America’s Recycling Future,” Consumer Brands Association, <https://consumerbrandsassociation.org/sustainability/recycling-policy-platform/>



capable of reuse, refill, or return by consumers, all of which reduce packaging waste and pollution. Companies are progressively targeting reuse systems to improve product circularity, as well as meet state legislative source reduction requirements such as those established by California Senate Bill 54. The development of reuse and refill systems has the potential to greatly improve upon the circularity of materials. An overly prescriptive and limiting classification of “recycling activities” may inadvertently hinder the growth of reuse, refill systems, other recycling technologies, and recycling innovation. We believe the criteria designating processes as “recycling activities” must be expansive enough to include new material management methods which promote circularity, and therefore, avoid discouraging sustainability innovation.

VII. Are there other actions that should be included in this strategy?

A.) Bioplastics data collection

Action A2.1 references increasing the availability of data on plastic product alternatives and their impacts, providing special attention to areas where gaps exist in our understanding of plastic products and alternative materials. We would like the EPA to include bioplastics in its review of Life Cycle Assessments (LCA) and resulting data collection. Bioplastics refers to a group of plastic alternatives which are biobased polymers, meaning polymers comprised of biological products made from biomass, and biodegradable plastics. Reviewing the functionality and impacts of bioplastics as an alternative material is essential, as many groups have identified their potential for use in flexible and rigid packaging, as well as textiles.¹⁹ Existing LCAs evaluating the impacts of bioplastics have produced fluctuating results, largely due to inconsistent testing criteria. Additionally, most LCA evaluations do not take into account health effects of the product during use. We suggest the EPA include bioplastics in its analysis to determine their viability as a plastic alternative, especially in regard to consumer safety in food contact use.

B.) Expanding scope of data collection

In addition to including bioplastics in A2.1, we recommend the EPA explore data analysis and collection beyond LCAs. We agree that LCAs are excellent tools in determining the valuation and externalities of plastic products but advise that additional data is equally essential in informing a holistic approach to addressing plastic pollution. For example, broader data collection that identifies the raw amount of plastic being produced and measures the applications of that plastic, as well as how different kinds of plastic from different sources are being recycled, would develop an improved understanding of the existing waste management system. Collecting data to inform an accurate assessment of how and where waste is currently being managed in our system is crucial to effectively carrying out actions identified in the Draft National Strategy, as well as informing innovation in the management of that material.

C.) Inclusion of food waste in Life Cycle Assessments

¹⁹ “Bioplastics Food Packaging,” Food Packaging Forum, February 2022, https://www.foodpackagingforum.org/fpf-2016/wp-content/uploads/2022/03/FPF_Factsheet_Bioplastics_v1.pdf.



We recommend that the Draft National Strategy include the Life Cycle Assessment impact of food waste prevention in the A2.6 action considerations. A fulsome understanding of the link between the life cycle of plastic products and associated greenhouse gas (“GHG”) emissions cannot be complete without considering the contribution of food waste. The EPA From Farm to Kitchen: The Environmental Impacts of U.S. Food Waste report estimates that food loss and waste accounts for 170 million metric tons of carbon dioxide equivalent GHG emissions annually.²⁰ This is without measuring the methane emissions created by rotting food waste present in landfills.²¹ Studies indicate that 6-8% of all human-caused greenhouse gas emissions would be reduced if the issue of food waste was addressed.²² It is important that solutions utilized in addressing plastic pollution take into account the contribution of food waste to GHG emissions and prioritize mitigating plastic pollution without exacerbating other harmful environmental impacts. Plastic packaging can significantly decrease the environmental impact of producing the food it contains through the prevention of food waste.²³ In order to accurately develop these solutions, we recommend LCAs conducted by EPA include the effect of food waste prevention through shelf-life improvement.

D.) Addressal of *de minimis* plastic used for food packaging

We are concerned that the draft National Strategy does not address the need for *de minimis* plastic content in food packaging. Food packaging materials such as paperboard, require a small percentage of plastic to uphold food safety and quality. For example, paper tube containers typically consist of up to 10% plastic material, metal cans may utilize 3% to create a seal, and other forms of paper cartons can rely on up to 25% plastic material content to maintain their food safety capabilities. This prevents increased food waste and contamination from pathogens, promoting safe consumption.²⁴ A transition from plastic food packaging to metal or glass alternatives poses its own complications environmentally and economically, in the form of high production energy consumption, higher potential for increased heavy metal content through recycling, or increased carbon equivalent greenhouse gas emissions throughout the product life cycle.²⁵ We recommend the EPA include *de minimis* plastic in its data collection and analysis actions, as well as policy considerations, for its necessity in creating food safety and reducing food waste.

²⁰ “From Farm to Kitchen: The Environmental Impacts of U.S. Food Waste,” Environmental Protection Agency, November 2021, https://www.epa.gov/system/files/documents/2021-11/from-farm-to-kitchen-the-environmental-impacts-of-u.s.-food-waste_508-tagged.pdf.

²¹ Jean Buzby, “Food Waste and Its Links to Greenhouse Gases and Climate Change,” USDA, January 24, 2022, <https://www.usda.gov/media/blog/2022/01/24/food-waste-and-its-links-greenhouse-gases-and-climate-change>.

²² “Fight Climate Change by Preventing Food Waste,” WWF, accessed June 8, 2023, <https://www.worldwildlife.org/stories/fight-climate-change-by-preventing-food-waste>.

²³ Chris Matthews, Fintan Moran, and Amit K Jaiswal, “A Review on European Union’s Strategy for Plastics in a Circular Economy and Its Impact on Food Safety,” A review on European Union’s strategy for plastics in a circular economy and its impact on food safety, November 26, 2020, <https://www.sciencedirect.com/science/article/pii/S0959652620353075>.

²⁴ Ibid.

²⁵ Glass Food Packaging, https://www.foodpackagingforum.org/fpf-2016/wp-content/uploads/2021/06/FPF_Factsheet_Glass_v1.pdf; Metal Food Packaging, https://www.foodpackagingforum.org/fpf-2016/wp-content/uploads/2021/06/FPF_Factsheet_Metal_v1.pdf.



Conclusion

We are appreciative of the opportunity to provide our recommendations on the Draft National Strategy to Prevent Plastic Pollution. Consumer Brands and its members are committed to creating a more sustainable future through CPG products and are prioritizing sustainable developments in packaging and recycling innovation. We welcome further opportunities to engage with EPA and other stakeholders throughout the Strategy development process.

Sincerely,

John Hewitt

A handwritten signature in black ink, enclosed in a thin black rectangular border. The signature is cursive and appears to read 'John Hewitt'.