



July 7, 2026

**Circular Action Alliance (CAA)
SCS Standards and Assurance Systems (SAS)**

**Re: Comments on Draft Certification Standard for Responsible Markets for Recycling
of Paper, Packaging, and Food Serviceware**

Dear Circular Action Alliance and SCS Standards and Assurance Systems:

On behalf of the Solid Waste Association of North America (SWANA), thank you for the opportunity to provide comments on the draft Certification Standard for Responsible Markets for Recycling of Paper, Packaging, and Food Serviceware (REM Standard).

SWANA appreciates the efforts of the Circular Action Alliance to develop a consistent framework for verifying responsible end markets under emerging extended producer responsibility (EPR) programs. We further appreciate CAA's participation in recent discussions with SWANA members and partners to help explain the draft standard and hear feedback from local governments, public agencies, haulers, material recovery facilities, processors, recyclers, and other interest holders.

SWANA supports the broader goals of transparency, accountability, environmental protection, worker health and safety, and responsible material management. We recognize that CAA and SCS Standards have undergone an extensive and thoughtful process to develop these standards, which have many strong points.



As EPR programs develop across North America, it is important that REM requirements be clear, technically accurate, administratively workable, and aligned with applicable law. The final standard should support responsible recycling outcomes without duplicating existing regulatory and reporting requirements. We encourage CAA to revise the REM Standard to clarify important distinctions for disposal facilities, avoid duplicative requirements for already-regulated facilities, and ensure that the final standard is practical for implementation by local governments, service providers, processors, recyclers, and end markets.

SWANA offers comments and recommended revisions for CAA's consideration as described in the July 7th, 2026 coalition letter submitted by SWANA, the National Waste & Recycling Association (NWRA), the Oregon Refuse & Recycling Association (ORRA), the Resource Recycling Coalition of California (RRCC), and the Washington Refuse & Recycling Association (WRRRA). The comments described in the letter were also submitted on the online portal.

SWANA looks forward to continued engagement with CAA, SCS Standards and Assurance Systems, and stakeholders as EPR programs and REM requirements continue to evolve.

Sincerely,



Kristyn Oldendorf
Senior Director of Public Policy & Communications
Solid Waste Association of North America

