



December 4, 2020

Office of Resource Conservation & Recovery
Office of Land and Emergency Management
U.S. Environmental Protection Agency
Washington, DC 20460

REF: Docket Number EPA-HQ-OLEM-2020-0462 (Draft National Recycling Strategy)

The Solid Waste Association of North America (SWANA) appreciates the opportunity to submit comments on the draft *National Recycling Strategy*. SWANA is an organization of more than 10,000 public and private sector professionals committed to advancing from solid waste management to resource management through their shared emphasis on education, advocacy and research. For more than 50 years, SWANA has been the leading association in the solid waste management field. These comments are submitted with the input of public and private solid waste industry professionals from across the United States.

SWANA strongly supports EPA having an active and visible role at the national level to create a stronger, more resilient, and cost-effective U.S. municipal solid waste recycling system. The *National Recycling Strategy* is a critical component of this expanded role and builds on EPA's work with the America Recycles stakeholders, development of the *National Framework for Advancing the U.S. Recycling System*, and recent announcement of a National Recycling Goal. Continued and increased engagement on this issue by EPA is necessary to secure American recycling for the future.

EPA's efforts can be amplified by ensuring coordination of the *National Recycling Strategy* across federal agencies. While EPA plays a leading role on this issue, other parts of the federal government can have a major impact on all three of the proposed objectives. This year's America Recycles: Summit speakers from the Department of Energy and the Department of Commerce demonstrated well how other agencies can further our nation's recycling goals.

SWANA supports the three objectives laid out by the *National Recycling Strategy* – 1) reduce contamination in the recycling stream, 2) increase processing efficiency, and 3) improve markets. These reflect similar goals outlined in the *National Framework* that were highlighted in the recent MRF Summit that SWANA held together with ISRI. These comments will highlight the parts that SWANA believes are most important and propose additional areas of action both within and beyond the stated objectives.

Reduce Contamination in the Recycling Stream

EPA proposes to reduce contamination in the recycling stream in order to enable more material to be recycled and ensure higher quality for manufacturing feedstock. SWANA agrees that these efforts are valuable, and many communities have shown that such improvements are possible with proven education and outreach.

EPA should focus on the development of a common recycling message that will help unify recycling programs across the US. There is currently too much confusion regarding what basic items can or cannot be recycled. A uniform message that focuses on types of materials and not resin codes would be preferable and would allow similar education and outreach throughout the US. The states of Massachusetts and Connecticut offer examples of unified recycling messaging that EPA can refer to. This would also assist communities that have limited budgets to devote to recycling education and outreach. By having ready-made messaging and materials they can use, this can help to close the recycling gap between communities with different levels of resources.

Education and outreach to the public would also be greatly improved by addressing confusion around the labeling of packaging and products as recyclable. The objective to reduce contamination in the recycling stream must address this issue. Contamination is not just a result of public confusion, but also mixed or poor messaging by the producers. A role for producers in this objective should be explicitly developed.

There is far too much confusion when the public is expected to interpret labeling for recycling directions. For instance, most consumers assume that any product that has the “chasing arrows” symbol on it can go into their recycling bin¹. This leads to contamination in places where that material is not accepted, and in the case of items like lithium-ion batteries, often leads to dangerous fires². It is understandable that producers and manufacturers want their items to be perceived as recyclable, but that should not come at the expense of our recycling system, worker safety, or public safety. EPA should coordinate with other agencies, such as the Federal Trade Commission, to explore more aggressive actions for fighting “greenwashing.”

A specific area of confusion is the chasing arrows symbol with the resin identification code (RIC) used on plastics. The RIC was not created to inform consumers about the recyclability of the material but has come to serve that role in the public’s eye. It is also referenced within laws of at least 39 states. Reform or removal of the RIC as a guide to recyclability should be a priority in order to effectively reduce contamination in the recycling stream.

Work is currently underway by many state and local governments, non-profits, and associations to improve labeling and reduce confusion. Unfortunately, this multitude of efforts may have the effect of creating further confusion, despite the good intentions. EPA’s role should be to bring together and coordinate these efforts in order to ensure that they are not working at cross-purposes. The agency should actively work to bring these different efforts together to share best practices, research, and ideas so that alignment can occur whenever possible.

Finally, although consideration of the sorting process in the design of new products is included under the objective to increase processing efficiency, its role in reducing contamination should also be recognized. EPA should continue fostering coordination between the packaging industry, manufacturers, and material recovery facility (MRF) operators so that packaging and products are designed so that they are actually recycled in most areas without special efforts by the consumer. Reduction in contamination ultimately starts with packaging and products that are designed to work within the existing recycling stream.

¹ <https://www.waste360.com/plastics/its-time-remove-recycling-symbol-plastics-commentary>

² <https://www.wastedive.com/news/lithium-battery-surge-recyclers-see-solutions/564253/>

Increase Processing Efficiency

EPA proposes to increase processing efficiency through investment and innovation, as well as by creating a more resilient recycling system. SWANA supports these goals and has seen that operations that have been able to invest in upgrades and new technologies have been able to improve processing efficiency.

SWANA would like to restate its support for EPA leading efforts to persuade manufacturers to consider recycling and the sorting process in the design of new products. It is imperative that packaging and products are designed with current recycling systems in mind in order to increase processing efficiency. Even with increased infrastructure investment and the integration of new technologies, recycling operations cannot keep up with changes in materials made by manufacturers and producers. Technology and investment will be integral to achieving this objective but must be accompanied by engagement by manufacturers and others to be successful. This should be an EPA priority.

That having been said, more focus needs to be turned to recycling infrastructure. Many recycling facilities have not been able to upgrade their processes or invest in innovative new technologies, particularly because the markets for recyclable materials have been depressed. Small operations often don't have the financial resources or stability to invest in needed upgrades. There needs to be more funding and incentives offered at the federal, state, and local levels. This should include both public and private entities.

EPA can play an important role by increasing awareness of available public and private funding and incentives and effective strategies to access the funding. This is directly within the capability and authority of the agency. This will also help with the objective to reduce contamination in the recycling stream, as upgraded infrastructure will allow recyclers to remove more contaminants and offer higher quality feedstock. This higher quality feedstock will also have more value and provide further financial security to the recycling facilities.

EPA can also be particularly helpful in improving understanding of available recycling infrastructure and needs. Though recycling is a global business, it was often built piecemeal at the state and local level. EPA has the reach and national perspective necessary to provide a centralized picture of the current recycling infrastructure, which will help to connect existing infrastructure and guide future investment. This should be a priority of the agency.

Finally, EPA should continue its efforts to develop and implement national recycling system definitions, measures, targets, and performance indicators. The work being done by the America Recycles stakeholder group, as well as the recent announcement of a national recycling goal with associated measures, is an excellent step in that direction. The inability to compare recycling metrics across systems is a major hindrance to understanding and improvement. EPA is well positioned to clearly define terms and measures that can be adopted by others to create more consistency.

Improve Markets

EPA proposes to improve markets for recyclable materials and products and better integrate recycled materials into the design of these items. SWANA strongly supports this objective, as increased demand for recycled materials is perhaps the single most important factor in ensuring that recycling remains sustainable in communities across the United States. The purchasing power of the federal government is

one such way to increase demand. EPA should explore requiring recycled content in all federal purchasing arrangement. Stable, consistent markets will allow for more investment in recycling.

SWANA encourages EPA to conduct market development workshops and dialogues as proposed by the strategy. Further analysis of end markets and making data available about the materials that manufacturers need are also valuable actions that EPA can take and that are within its capability and authority. This will be particularly useful for smaller recycling operations that tend to struggle to find nearby markets. To have access to regional information to match sellers and buyers would be beneficial.

EPA should also analyze existing barriers to using recycled content in products. For a material such as glass that has been problematic for many programs, it is important to look at alternative uses, such as engineering applications. Examples include use of recycled materials in roadway construction and beneficial reuse as alternative daily cover at landfills. Some of these applications are already proven but are held up by artificial barriers due to outdated laws or engineering standards. Understanding why certain recycled materials are not in demand may help to open new avenues for their use.

Additionally, EPA should analyze technological limits to recycled content. For instance, paper fibers are generally too short after being recycled seven times to be usable. Similar data on production losses for aluminum cans, glass bottles, plastic bottles and containers is necessary to set appropriate recycled content standards.

Additional Comments

SWANA would also like to provide comment on other actions that should be included in the strategy and provide additional information or recommendations as requested by EPA.

While education and outreach to the public, producers, and manufacturers are important parts of this strategy, SWANA also recommends the development of educational materials and briefing documents targeted at elected officials, as well as outreach efforts to this segment. Municipal and state level officials are aware of the challenges facing recycling and are seeking solutions. They also pass legislation to determine recycling goals and requirements that have direct effects on the contents of the *National Recycling Strategy*. It is important that this segment be specifically included.

Another important area that is not addressed in the strategy is the collection of recyclable materials. This includes curbside collection, drop-off sites, and other methods. The movement of the material from the consumer to the recycling facility is a key part of the process. It determines access to recycling, as well as contamination and quality of materials received. Its integral role in recycling justifies it to be called out specifically, as it will be an important factor as to how and whether recycling can continue and expand in most communities.

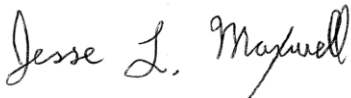
SWANA would also like to propose that EPA include improving contracts for recycling facilities as a strategy. These contracts are key component to improving recycling quality, managing costs, and tracking metrics. An example of a strategy to address this topic would be to develop an online national database of contracts sorted by type, which government can access and learn from. There are also existing guides that can be promoted, including the SWANA & National Waste and Recycling

Association's *Joint Advisory on Designing Contracts for Processing of Municipal Recyclables*³ and the Recycling Partnership's *Guide to Community Material Recovery Facility Contracts*⁴.

Finally, it is important that the *National Recycling Strategy* not penalize or undermine other waste management practices in the waste management hierarchy, including reduction, reuse, energy recovery, composting or other treatment and disposal methods. The integration of waste management strategies in many cases can be successful at improving recycling profitability.

SWANA thanks EPA for issuing the proposed *National Recycling Strategy* and for considering SWANA's comments. If you have any questions about these comments, please contact Jesse Maxwell at jmaxwell@swana.org.

Sincerely,



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cc: David Biderman, SWANA Executive Director & CEO

³ https://swana.org/docs/default-source/resources-documents/recycling-library/joint_advisory-designing_contracts-processing_municipal_recyclables.pdf?sfvrsn=a69aff01_2

⁴ <https://recyclingpartnership.org/mrf-contracts/>