

## **Executive Summary of EPA National Recycling Strategy: Part One of a Series on Building a Circular Economy**

### INTRODUCTION

The U.S. Environmental Protection Agency (EPA) issued a finalized [National Recycling Strategy](#) (Strategy) on November 15 in conjunction with America Recycles Day. This Strategy “is focused on enhancing and advancing the national municipal solid waste (MSW) recycling system and identifying strategic objectives and stakeholder-led actions to create a stronger, more resilient and cost-effective U.S. MSW recycling system.”<sup>1</sup>

This will be achieved through five strategic objectives:

- 1) Improve Markets for Recycling Commodities
- 2) Increase Collection and Improve Materials Management Infrastructure
- 3) Reduce Contamination in the Recycled Materials Stream
- 4) Enhance Policies to Support Circularity
- 5) Standardize Measurement and Increase Data Collection.<sup>2</sup>

The Strategy is to be implemented in conjunction with the voluntary National Recycling Goal to increase the national recycling rate to 50 percent by 2030 <sup>3</sup>.

Significant changes were made to the Strategy since the draft version was released in October 2020. These are due to comments received from the public as well as a change in Administration during that time. A broader goal of achieving a circular economy has been added. EPA intends to develop a series of strategies of which the National Recycling Strategy is the first. Future strategies will address plastics, food waste/organics, critical minerals and electronics, the built environment, and textiles.

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*We’ve all heard the phrase “Reduce, Reuse, Recycle.” It’s been taught in schools; we’ve heard it on TV; and EPA, along with so many other organizations have been saying it for years. But those three words can only take us so far – it’s time to transform the United States Recycling System.*

– EPA Administrator Michael Regan

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The finalized Strategy includes climate change and environmental justice priorities which were not in the draft version. This includes a commitment from EPA “to develop a new goal to reduce the climate impacts from materials use and consumption.”<sup>4</sup> The greenhouse gas emissions from natural resource extraction and processing are cited as a primary driver for the need for recycling and for expanding to a circular economy approach.

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<sup>1</sup> Strategy, p. 1

<sup>2</sup> Strategy, p. 2

<sup>3</sup> <https://www.epa.gov/recyclingstrategy/us-national-recycling-goal>

<sup>4</sup> Strategy, p. 4

The impact of waste management on communities, especially disadvantaged ones, is noted by EPA and the implementation of circular economy approaches and increased recycling are seen as an opportunity to address environmental, social justice, and civil rights concerns.<sup>5</sup> This includes impacts on disadvantaged communities abroad.<sup>6</sup> The inclusion of an international element to the Strategy is also a change from the draft to final version. This includes consideration of joining the international Basel Convention.<sup>7</sup>

SWANA has played a major role in the development of the National Recycling Strategy<sup>8</sup> with direction from the SWANA Core Advocacy Group, Recycling Task Force, Sustainable Materials Management Technical Division, and other members. SWANA has long collaborated with EPA on recycling and is proud to be an original signatory of the 2018 America Recycles Pledge to improve America’s recycling system from which the Strategy and other important actions have grown.<sup>9</sup>

## BACKGROUND

That National Recycling Strategy builds upon the National Framework for Advancing the U.S. Recycling System<sup>10</sup> which was developed by the America Recycles pledge signatories. SWANA submitted comments during the public comment period after the draft Strategy was issued.<sup>11</sup> EPA received 156 comments, including substantial ones from U.S. Senator Tom Carper (D-DE). The input was characterized by EPA as three primary recommendations:

- Expand scope to consider waste reduction, reuse, and/or a circular economy
- Explicitly incorporate environmental justice and equity
- Expand scope to go beyond MSW to include other materials (C&D, textiles, organics, electronics, etc.)<sup>12</sup>

The most important change from the draft to the final version is that the Strategy is now situated within a larger 10-year vision and strategic direction for the EPA’s Sustainable Materials Management Program. The Strategy frames recycling as one component of a waste and materials management system that includes reduction, reuse, redesign, composting, biological recycling, and consideration of chemical/advanced recycling. These additional activities will be addressed in future strategies.

## STRATEGY OBJECTIVES

### Improve Markets for Recycled Commodities

This objective is meant to “Improve and increase markets for recyclable materials and recyclable products, in addition to better integrating recycled materials into product and packaging designs.”<sup>13</sup>

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<sup>5</sup> Strategy, p. 6

<sup>6</sup> Strategy, p. 7

<sup>7</sup> Strategy, p. 19

<sup>8</sup> EPA acknowledged SWANA’s assistance in developing the Strategy

<sup>9</sup> <https://www.epa.gov/recyclingstrategy/forms/america-recycles-pledge>

<sup>10</sup> [https://www.epa.gov/sites/default/files/2019-11/documents/national\\_framework.pdf](https://www.epa.gov/sites/default/files/2019-11/documents/national_framework.pdf)

<sup>11</sup> <https://www.regulations.gov/comment/EPA-HQ-OLEM-2020-0462-0128>

<sup>12</sup> EPA Webinar, *Pre-Release Preview for Stakeholders*, November 10, 2021

<sup>13</sup> Strategy, p. 15

While similar to the draft Strategy, this proposal explicitly cites the need to “ensure that markets for recyclables do not further harm the environment or place additional burdens on communities.”<sup>14</sup>

The objective now also calls for exploration of U.S. ratification of the Basel Convention and encouragement of environmentally sound practices in trade with other countries.<sup>15</sup> This international focus is a shift from the draft which only addressed domestic activity and impacts.

### Increase Collection and Improve Materials Management Infrastructure

This objective seeks to achieve increased collection opportunities, improved material sorting, increased efficiency of materials processing infrastructure, increased material collection, and a more resilient recycling system through investment and innovation.<sup>16</sup> Reflecting the addition of environmental justice concerns within the Strategy, a national environmental justice assessment of non-hazardous solid waste management infrastructure is called for, including landfills, waste-to-energy facilities, transfer stations, and material recovery facilities (MRFs).<sup>17</sup>

Of note for MRFs as well is the development of a 10-year infrastructure milestone list, a universal guide for contamination audits, and exploration of regionalization strategies, such as a “hub-and-spoke” model.<sup>18</sup>

### Reduce Contamination in the Recycled Materials Stream

Reduction of contamination within this objective is to be achieved primarily through education and public outreach efforts. This includes the development and sharing of resources at all levels. Notably, the Strategy also calls for “clarifying existing labels that are confusing to consumers – for example, the resin identification code” to make recycling easier.<sup>19</sup> Most states have laws mandating use of resin identification codes on certain products.

### Enhance Policies and Programs to Support Circularity

This objective is intended to “increase coordination, availability and accessibility of information on recycling programs and policies at the federal, state, tribal, and local levels.”<sup>20</sup> It includes conducting analyses of different policy options, with many examples given, including extended producer responsibility, bottle bills, recycling mandates, and landfills bans.<sup>21</sup> The Strategy also calls for a study on including environmental and social costs in product pricing, as recommended to EPA by the Government Accountability Office in 2020.<sup>22</sup>

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<sup>14</sup> Strategy, p. 15

<sup>15</sup> Strategy, p. 19

<sup>16</sup> Strategy, p. 21

<sup>17</sup> Strategy, pp. 21 - 22

<sup>18</sup> Strategy, pp. 22 - 23

<sup>19</sup> Strategy, p. 27

<sup>20</sup> Strategy, p. 29

<sup>21</sup> Strategy, p. 30

<sup>22</sup> Strategy, p. 30

## Standardize Measurement and Increase Data Collection

According to EPA, “Stakeholders across the recycling system agree that more consistent measurement methodologies are needed to measure recycling system performance.”<sup>23</sup> To that end, this objective calls for the development and implementation of national recycling system definitions, measures, targets and performance indicators” along with a plan for “consistent tracking and reporting of recycling activities on a regional and national scale.”<sup>24</sup>

## NEXT STEPS

With the publication of the final National Recycling Strategy, EPA will now move towards implementation. This will be tracked via the Circular Economy Implementation Plan Online Platform.<sup>25</sup> Leaders and supporters for each action are being sought and interested entities can apply for these roles online.<sup>26</sup> SWANA is reviewing potential opportunities to participate and will be seeking input from the Core Advocacy Group, SMM Technical Division, and the Recycling Task Force.

The Strategy also states that EPA “will develop a new goal to reduce the climate impacts from materials production, consumption, use and disposal.”<sup>27</sup> This goal will complement the National Recycling Goal and the U.S. goal to halve food loss and waste by 2030. Further details of its extent and timing are not included within the Strategy.

Since the National Recycling Strategy is one part of a larger circular economy vision for the United States, EPA will also begin developing additional strategies that go beyond MSW recycling.<sup>28</sup> Timelines and details for those processes are also still in development.

The National Recycling Strategy represents a major transformation of the United States recycling system. Any one of these objectives is a major lift and the long-term success of the Strategy remains to be seen. SWANA will continue its deep engagement on these issues and work to represent the municipal solid waste industry in accordance with SWANA policy and the guidance of its members.

## Questions?

If you have any questions or comments concerning EPA’s National Recycling Strategy or recycling issues, please contact Jesse Maxwell, SWANA’s Advocacy and Safety Manager, at [jmaxwell@swana.org](mailto:jmaxwell@swana.org).

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<sup>23</sup> Strategy, p. 33

<sup>24</sup> Strategy, p. 33

<sup>25</sup> <https://www.epa.gov/recyclingstrategy/circular-economy-implementation-plan-online-platform>

<sup>26</sup> <https://www.epa.gov/recyclingstrategy/forms/take-action>

<sup>27</sup> Strategy, p. 35

<sup>28</sup> Strategy, p. 36