

# POLICY POSITION



## Non-Medical PPE Access for Waste & Recycling Collection

### NWRA POSITION

Waste and recycling collection services have been deemed essential during the COVID-19 national emergency and have increased daily exposure to potential infection when compared to other industries. Therefore, our member companies request an allocation of 250,000 units of Personal Protection Equipment (PPE) in any Phase IV response to COVID-19. This is vital to keep our workforce safe.

### BACKGROUND

During this national emergency, the waste and recycling industry is obligated by its elevated status as “essential” and required by various state and local orders to continue providing services to protect the public’s health and safety. In order to do so, they must ensure that among the thousands of waste touchpoints per day their frontline employees have the equipment to remain safe and healthy.

As the supply chain is further stressed during the COVID-19 pandemic, NWRA asked FEMA starting on March 23 to clarify our industries status with respect to “critical essential infrastructure” access to PPE.

On April 23 a FEMA memo was issued detailing the first release of 6.5 million non-medical cloth face masks FEMA was releasing directly to industry sectors. We worked to understand if waste/recycling collection was intended to be covered under the listed critical infrastructure section of "hazardous materials management" eligible for this distribution. Per [CISA 3.0 guidance](#) we are considered "essential critical infrastructure" under the following five headings: "Public Works and Infrastructure Support Services," "Critical Manufacturing," "Hazardous Materials," "Healthcare / Public Health," and "Transportation and Logistics."

However, due to this lack of clarity, our industry was not allocated any of the initial 6.5 million non-medical cloth masks that went directly to other critical and essential infrastructure industries. We must now compete on the state-level with all other industry sectors who do not bear the same exposure risk as our front-line collection employees.

Enhanced access to PPE is vital if we are to continue a high level of public health not only related to COVID-19, but for the other numerous public health issues that result from waste not being picked up. Our workers are on the frontlines making sure that the waste generated during the pandemic is properly disposed of in order to minimize a greater public health threat. They cannot do that safely without the appropriate PPE as indicated by [OSHA](#).

### CONGRESSIONAL REQUEST

Specific allocation of 250,000 units of PPE for the waste and recycling collection employees in COVID-19 response legislation (commonly known as “Phase IV”).

### KEY TAKEAWAYS

- FEMA issue a memo, letter to Governors, or other official document clarifying the waste and recycling sector is considered a critical and essential infrastructure service to assist with us accessing PPE at the state-level.
- Congress should allocate specific PPE for this industry sector to prevent infection and ensure waste and recycling collections in our communities and among our businesses continues uninterrupted.
- To the extent able, we ask Congressional staffs to connect us with their state emergency response teams and/or Governors staff to coordinate PPE access.