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Via electronic transmission: ORCRMMeasurement@epa.gov

U.S. Environmental Protection Agency
Office of Resource Conservation and Recovery
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Sir or Madam:

The National Waste & Recycling Association (NWRA) appreciates the opportunity to provide comments on the Environmental Protection Agency's (EPA) draft National Recycling Strategy. NWRA is a trade association that represents private-sector waste and recycling companies in the United States, and manufacturers and service providers who do business with those companies. NWRA's members operate in all fifty states and the District of Columbia. NWRA provides leadership, education, research, advocacy, and safety expertise to promote North American waste and recycling industries, serve as their voice, and create a climate where members prosper and provide safe, economically sustainable, and environmentally sound services.

NWRA members are interested in the proposed action as they have hundreds of recycling collection and processing operations across the country. The strategy has identified the right objectives to support making recycling resilient and strong.

Objective 1 – Reducing contamination in the recycling stream

NWRA agrees that reducing contamination in the recycling stream is an important objective. Recycling education resources are limited and have been generally focused on increasing recycling participation and promoting the value of recycling. In order to reduce contamination, education needs to reduce confusion about the types of materials and form factors that can be recycled. In addition, education is necessary about what cannot be recycled in curbside programs, or what must be taken to drop-off. Last, the public needs to know how to recycle, such as “caps on,” dry, and loose.

We agree that consistent messaging will help reduce confusion and support efforts to develop consistent labels. The public often gets information from product labels and too often those labels feature a recycling symbol without any further direction. NWRA supports consistent and clear labeling about recycling on products and packaging.

We urge EPA to take on the task of establishing these messages:

1. What can be recycled
2. What cannot be recycled
3. What needs to be recycled at a drop-off
4. What can be recycled in some areas, “check locally”
5. Where to find information about local programs
6. How to prepare recyclables

In addition, we urge EPA to make recommendations on the use of the recycling symbol on product labels along with any recommended restrictions in coordination with Federal Trade Commission’s Green Guides.

Objective 2 - Increase Processing Efficiency

NWRA supports the objective to increase processing efficiency. A MRF is designed to process material based on an anticipated mix of materials. Initially, MRF equipment was purchased with the expectation that it would be used for a minimum of ten years. However, the mix of materials has changed dramatically over the past decade with the decline of newspapers, the increase in cardboard from the growth in e-commerce/home delivery, light-weighting of cans and plastic bottles and the move toward flexible plastic pouches.

The change in material mix means that the MRF is handling a mix of materials significantly different than was it was originally designed to handle. Some equipment may be able to be repurposed to handle different materials than originally anticipated. However, not all of it can be, leading to a less efficient processing system. Such rapid change in material composition can place significant financial burden, or risk, on long-term investments.

A new MRF will face some of the same problems. While designed to handle today’s mix of materials, it may not be able to efficiently handle the mix of materials that will be delivered to it ten years from now. EPA can help MRFs to anticipate these changes by projecting the material changes that can be expected over the next decade. For example, what can the industry expect to change over the next decade with respect to packaging? Will light-weighting of containers continue? By how much? What reductions can be expected? Will transition from rigid to flexible containers continue? By how much? Will more packaging be “designed for recycling”? If so, how?

As EPA develops these projections, it may become apparent that some of the fastest growing packaging is not recyclable. Yet this non-recyclable packaging might be environmentally better than recyclable packaging. Therefore, we recommend that EPA conduct science-based life-cycle analysis of various packaging forms considering end-of-life management as well as other environmental attributes such as energy usage, climate change impacts and water impacts in order to promote the best environmental outcomes.

Objective 3 – Improve Markets

For strengthening markets, NWRA supports efforts to increase the use of recycled content. Reverse logistics associated with collecting increasingly lighter materials in an ever-expanding number of forms from individual homes and then separating them into single product bales will always be an expensive process. It will generally be less expensive to obtain virgin raw materials, especially virgin resins. Given that, improved markets require commitments to utilize recycled content even when the price exceeds the cost of virgin materials through a variety of policy incentives. Achieving EPA's recycling goal means that supply, which is already inelastic, will continue to increase. Demand needs to be increased in order to balance out the supply. Continuing to focus on supply without increasing demand will cripple the future of recycling in the U.S.

NWRA appreciates the opportunity to comment on the proposed options for recycling goals and we look forward to continuing to work with your office on this matter. Should you have any questions, please call Anne Germain at 202-364-3724 or e-mail at agermain@wasterecycling.org.

Very truly yours,

A handwritten signature in black ink that reads "Darrell K. Smith". The signature is written in a cursive, flowing style.

Darrell K. Smith, PhD
President & CEO