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December 4, 2020

U.S. Environmental Protection Agency
Office of Land and Emergency Management Docket
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

via www.regulations.gov

Re: Docket No. EPA-HQ-OLEM-2020-0462

Dear Sir or Madam:

The Materials Management Subcommittee of the Association of State and Territorial Solid Waste Management Officials (ASTSWMO) appreciates the opportunity to provide comments on EPA's Draft National Recycling Strategy and the new U.S. National Recycling Goal to increase the national recycling rate to 50 percent by 2030. The following comments are from the Subcommittee and have not been reviewed or adopted by the ASTSWMO Board of Directors. In addition, individual State or Territorial (State) programs may also provide comments based on their own State perspectives and experiences.

ASTSWMO is an association representing the waste management and remediation programs of the 50 States, five Territories and the District of Columbia (States). Our membership includes State materials management and recycling programs.

As expressed in ASTSWMO's [Recycling Position Paper](#) (dated July 21, 2020), substantial change is needed in order to address the many systemic challenges facing recycling today. The ASTSWMO position paper recommends that the national recycling strategy include the following elements, at a minimum:

- An outline of infrastructure improvements needed for U.S. recycled materials to meet domestic market specifications, and a plan for who will make such needed investments;
- A plan to develop the needed capacity and improvement of domestic markets to use recycled materials generated in the U.S.;
- A plan to assist State and local governments on how to reduce contamination of recyclables caused by incorrect materials being placed in recycling containers; and
- A plan for more consistent tracking and reporting of recycling activities on a regional and national scale.

The national strategy for recycling should also clearly articulate how the economics of recycling will be sustainable in the future, addressing the current high costs to municipalities/taxpayers and the current low market value of recycled materials.

We are pleased to see that EPA's Draft National Recycling Strategy addresses many of the issues raised in the ASTSWMO position paper. It has taken the four action areas from the National Framework (Promote

Education and Outreach; Enhance Materials Management Infrastructure; Strengthen Secondary Materials Markets; and Enhance Measurement) and modified them to make three objectives: 1. Reduce Contamination in the Recycling Stream, which includes Education and Outreach; 2. Increase Processing Efficiency, which addresses infrastructure as well as measurement; and 3. Improve Markets. These are all key areas to address.

However, in our position paper, we highlighted the need for plans to address infrastructure improvements, domestic markets, contamination reduction, and better measurement and tracking. While the Draft National Recycling Strategy includes many good potential actions in all these areas, the actions do not equate to a plan, as there is a lack of detail about how these actions will be implemented. Furthermore, EPA's Draft Strategy does not address the economics of recycling and the steps that will be taken to make the country's recycling system more economically sustainable. We encourage EPA to add details in the final strategy on how the objectives will be achieved and become financially sustainable based on the input from stakeholders on the proposed questions.

Is your organization willing to lead an action or collaborate with others to implement the actions? It is not clear how States could lead a national, cohesive action. States collaborate with others regularly and will continue to do so, but it would be highly unlikely that every State and Territory would implement the same measures without direction from EPA or other national source. The Subcommittee recommends clearly identifying what the federal government can commit to do to advance the strategy, and where support is needed from States and organizations.

What are the most important roles and/or actions for federal agencies to lead? Federal agencies need to set a bold vision for the future of a circular economy. The new recycling goal, 50 by 30, is a big step in that direction. Setting this goal at the national level shows support for recycling and can provide the necessary impetus for States to take further action. It is important to define what the 50 percent recycling goal represents (e.g., municipal solid waste (MSW) or all waste) and how it will be measured consistently throughout the country. We recognize the challenges associated with measurement: many States define and measure recycling differently, and some do not track it at all. We commend EPA for its work in this area over the past years, and with this new goal, it is critical that this work continues.

While we recognize this is a National Recycling Strategy, it is important to acknowledge the waste management hierarchy. Many States are now setting waste reduction goals in addition to recycling or diversion goals. For example, Vermont has recently adopted the following goals: 50% diversion of MSW by 2025; 25% reduction of MSW disposed by 2025; and 10% reduction in total waste generated. Given that EPA's Waste Hierarchy puts reduction and reuse first, adding an overarching waste reduction goal, in addition to the recycling goal, is a critical step in achieving the environmental goals associated with materials management.

The Draft National Recycling Strategy addresses many key areas. However, it is silent on the economics of recycling. The Draft Strategy includes no comment on how the recommended actions could be funded, or how the funding of the recycling system overall could be made more sustainable and equitable. As noted by many in the industry, absent significant changes to the way materials are managed, recycling as a revenue stream is not likely to occur again. In order to be sustainable for the foreseeable future, the economics of recycling needs to be less dependent on municipalities and tax or rate payers. This is more important now than ever with COVID-19 budget impacts. The need to find new ways to address the funding challenge must be addressed and should be included in the Strategy. Indeed, addressing funding

is an action that would respond to the question asked in the Draft Strategy about actions that would be *“the most important and would have the greatest positive impact at the local, regional, and national level.”*

If you have any questions about these comments, please contact me at 802-522-5938 or at Cathy.Jamieson@vermont.gov.

Thank you very much for this opportunity to provide comments on EPA’s Draft National Recycling Strategy. ASTSWMO looks forward to continuing our work with EPA and other stakeholders to improve the U.S. recycling system and achieve the environmental and economic benefits of recycling.

Sincerely,

A handwritten signature in blue ink that reads "Catherine Jamieson". The signature is written in a cursive style with a large initial 'C'.

Catherine Jamieson (VT), Chair
ASTSWMO Materials Management Subcommittee