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October 2, 2020

To: ORCRMMeasurement@epa.gov

Re: EPA National Recycling Goals

Thank you for the opportunity to comment on the U.S Environmental Protection Agency's (EPA) Proposed National Recycling Goals. Members of the Sustainable Materials Management (SMM) Task Force within the Materials Management Subcommittee of the Association of State and Territorial Solid Waste Management Officials (ASTSWMO) have been participants in EPA's America Recycles Day efforts to create the *National Framework for Advancing the U.S. Recycling System*. We understand the difficulty of establishing a national set of recycling goals and appreciate the continued efforts to further enhance the nation's recycling system. We are pleased to continue working with EPA to address the challenges in the country's recycling system.

The following comments are from the SMM Task Force 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.

- Systemic change is needed. As mentioned in ASTSWMO's position paper on Recycling<sup>1</sup>, the stresses on the U.S. recycling system are severe and the status quo is not sustainable. Significant changes and a different approach are needed for real, sustainable, long-term solutions. ASTSWMO recommends EPA encourage substantial changes to the country's recycling system in the national strategy, and for the proposed recycling goals.
- Absence of Tangible Recycling Rate Goal. Upon hearing the term "goal", the Task Force was expecting a numeric goal. This expectation was tied to a combination of factors. First, many of our members come from States that have a statutory recycling goal. Second, numerous other private and public bodies have established recycling and waste minimization goals in recent years. Given these trends and the nation's historic recycling rate of approximately 35 percent, we expected a numerical target to provide a benchmark by which the States and industry could evaluate performance. A numeric goal could be useful. Numerous States do not have recycling goals. For those States, a national standard could serve as a catalyst to advance the recycling work that is nonetheless underway. Many of the States that do have recycling goals have found a goal alone is insufficient to make progress. Without a national numerical goal, it is unclear how to evaluate the relative success of the other proposed measures. Providing a "finishing line" would serve as valuable guidance for any State that is currently evaluating the needs of its recycling programs.
- Implementation of Goals. The proposed goals include multiple metrics intended to measure various aspects for recycling improvements. Most all of these measurements have value and could certainly lead to an enhanced understanding of the problems currently facing recycling and facilitate necessary

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<sup>1</sup> ASTSWMO Position Paper on Recycling is available at <http://astswmo.org/astswmo-recycling-position-paper/>.

communications to foster systemic improvements. However, additional specificity is needed to address the potential national impact of the measures outlined in the proposal. One such detail is whether the measures are intended to apply as a uniform national standard or as a framework for State implementation. Recycling service coverage, infrastructure sophistication, and market availability vary State-to-State and even within States. Some of the Task Force members come from States with robust Statewide recycling programs; others are from States with operational structures that are largely deferential to local implementation. Recognizing the breadth of that spectrum, it would be helpful to understand the expectations of individual jurisdictions in supplying data into and achieving the proposed metrics. This would allow individual States to identify potential areas of improvement and where it may be difficult to meaningfully contribute or toward achieving a national goal.

- Nationalized Data. The proposed goals outline a potential treasure trove of data that could paint a comprehensive picture of the state of recycling in America. The Task Force supports a data-driven approach to encourage the development of sound recycling policy. However, the availability of data is the most challenging aspect of this effort as consistent data does not exist. The Task Force has numerous questions about how data will be acquired, who will be responsible for its acquisition, and how data will be used on a national stage. The proposed goals seem to contemplate aggregating information from numerous fields to generate national figures. There are some areas where that is intuitive. In others, it may be a struggle to effectively capture a national standard by compiling and averaging the sum of local or industry data. For example, contamination, capacity utilization, processing costs, and commodity prices vary State-to-State and are often dynamic because of a series of local and national factors. In addition, some States do not track recycling data at all or do so using practices and measures that vary from their sister States. A sound methodology to accommodate those differences would be imperative to developing a workable tool for States to use. The Task Force would welcome further conversations about developing such a methodology, particularly if there is an expectation that States would be financially responsible for acquiring and sharing the data.
- Additional Metric Specificity. The Task Force was not clear on the intent behind some of the proposed measures. Further information on the intended outcomes from each measure would be beneficial, as it would afford the opportunity for more precise commentary. For example, soliciting requests for recycling participation rate information, as described in the proposal, could prompt a plethora of factually accurate, but incongruous, responses. Indeed, some jurisdictions could report locations served by a single drop off location as having uniform collection availability, while others with similar opportunities might only offer information regarding curbside collections or calculate participation by actual resident use of drop off locations. Still others might justifiably further qualify their information to include the ratio of eligible users who regularly and properly use offered services (e.g., those who do not contribute toward contamination). The Task Force had similar questions related to the information sought for nearly each of the potential measures and is open to providing further information as part of a future dialogue.

Measurement is vital, and challenging. We appreciate the work EPA has been doing for many years to improve recycling measurement across the country. Continuing efforts to improve measurement and adding more metrics, including the ones proposed, is very important to addressing the challenges in the recycling system. Knowing how this hard work might get done, and having an end goal to strive for, would be very helpful.

ASTSWMO SMM Task Force Comments re: EPA National Recycling Goals

If you have any questions about these comments, please contact Janine Bogar, ASTSWMO SMM Task Force Chair, at [janine.bogar@ecy.wa.gov](mailto:janine.bogar@ecy.wa.gov), and James Jennings, Task Force Vice-Chair, at [james.m.jennings@illinois.gov](mailto:james.m.jennings@illinois.gov).

Thank you.

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