



ASTSWMO, Providing Pathways to Our  
Nation's Environmental Stewardship Since 1974

July 31, 2023

U.S. Environmental Protection Agency  
Office of Resource Conservation and Recovery  
Resource Conservation and Sustainability Division

Via [www.regulations.gov](http://www.regulations.gov)

Re: Docket ID No. EPA-HQ-OLEM-2023-0228

Dear Sir/Madam:

The Materials Management Subcommittee of the Association of State and Territorial Solid Waste Management Officials (ASTSWMO) appreciates the opportunity, through the U.S. Environmental Protection Agency's (U.S. EPA) Request for Information (RFI) published in the Federal Register on May 1, 2023 (88 FR 27502), to provide written comments on the Draft National Strategy to Prevent Plastic Pollution. 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 input 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.

In July 2020, ASTSWMO issued our [Recycling Position Paper](#), which highlighted the membership's understanding that more action was needed to address the impacts of plastics in the environment. These opportunities included the need for improvements to the existing materials management infrastructure and changes to collection systems. In addition, the Position Paper identified strategies portions of the membership considered to enhance the existing recycling stream, such as passing bans of certain single-use plastic products, mandating the use of certain percentages of post-consumer recycled content in specified products and packaging, and studying alternatives for conventional handling of these materials, such as extended producer responsibility legislation. Minimizing the amount of microplastics or nanoplastics entering waterways would be among the many benefits of these strategies. The Draft National Strategy to Prevent Plastic Pollution shares many of those elements, which ASTSWMO appreciates.

The Draft Strategy's three objectives and thirteen sub-objectives align with many of the goals of ASTSWMO's members. As in numerous historic instances, ASTSWMO and our members are willing to lead and collaborate on actions to affect national policies for waste and materials management, environmentally sustainable practices, and environmental restoration. The Draft Strategy is scoped to accomplish these objectives. However, additional details on the specific approaches anticipated for achieving these objectives and the role(s) States are expected to play would be beneficial to allow the ASTSWMO membership to provide specifically tailored comments on the individual Strategy components. For example, many of ASTSWMO's members do not have the statutory authority to regulate plastics production. Accordingly, understanding the expectations of

States in this component of the Strategy would be helpful. Similarly, understanding the breadth of federal resources available to assist would permit States to offer more particular feedback on the viability of the numerous studies, public education campaigns, and infrastructure enhancements identified as mechanisms to minimize the impact of plastics. In addition, there are several instances where decisions are being made that require oversight and it is unclear who would be providing the oversight to ensure compliance. As you are aware, the recent round of Solid Waste Infrastructure for Recycling Grant funding afforded many jurisdictions the first opportunity in quite some time to financially support recycling education, infrastructure, and data management exercises. Many States lack the existing resources to undertake these valuable activities absent enhanced federal support.

The ASTSWMO Materials Management Subcommittee is committed to continuing to work with U.S. EPA to accomplish its aim of minimizing the adverse impacts of plastics in the environment. Further clarity on these points will enable the ASTSWMO membership to best identify how their unique jurisdictions can best engage in this sphere.

If you have any questions about this input, please contact me at [kathryn.perszyk@deq.virginia.gov](mailto:kathryn.perszyk@deq.virginia.gov) or 804-698-4047.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kathryn Perszyk', is positioned above the typed name and title.

Kathryn Perszyk (VA)  
Chair, ASTSWMO Materials Management Subcommittee