



December 4, 2020

Mr. Peter Wright  
Assistant Administrator  
Office of Land and Emergency Management  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

**RE: EPA Draft National Recycling Strategy, Docket ID EPA-HQ-OLEM-2020-0462**

Dear Assistant Administrator Wright,

On behalf of the nation's mayors, cities and counties, we appreciate the opportunity to provide comments on the U.S. Environmental Protection Agency's (EPA) Draft National Recycling Strategy (Draft Strategy). Building on EPA's 2019 *National Framework for Advancing the U.S. Recycling System*, we support EPA's efforts to create a stronger, more resilient and cost-effective U.S. municipal solid waste recycling system. Collaborative efforts to reimagine and restructure our nation's waste management and recycling systems are even more critical as local governments face new challenges resulting from China's National Sword Policy and the coronavirus pandemic.

As intergovernmental partners with the EPA, local governments have a direct interest in the draft National Recycling Strategy. As both regulators and regulated entities, local governments are responsible for protecting local air, water and land resources through delegated authority for state and federal laws.

Management of municipal solid waste (MSW) and recycling is a significant operation that relies heavily on local governments. Local governments are the backbone of our nation's recycling efforts with millions of dollars being spent every year from our general funds, enterprise funds, as well as user fees. As a result, local governments have driven growth and participation in recycling programs.

In 2017, the United States generated 267.8 million tons of MSW or 4.51 pounds per person per day. While the majority of this waste was landfilled, approximately 35 percent was recycled or composted and 12 percent was utilized in waste-to-energy recovery systems. Together, recycling, composting and waste-to-energy recovery saved over 184 million metric tons of

carbon dioxide equivalent, comparable to taking 39 million cars off the road. Regardless of urban or rural community, local recycling programs are crucial to minimizing pollution.

Before the China National Sword Policy, recycling programs were a revenue stream for some communities. With the new restrictions, however, recycling programs are increasingly expensive to operate and sustain, and some local governments are making the tough decisions to cut their services. We see local governments stopping the collection of mixed paper recycling because the waste was too contaminated and essentially worthless. Other communities have stopped recycling glass due to breakage, lack of markets and the cost to ship the material long distances. And unfortunately, other local governments have been forced to suspend all recycling services due to fiscal constraints. At the other end of the spectrum, however, some communities, particularly larger urban areas, are doubling down on their commitment to recycling and making investments in new facilities.

Before the coronavirus pandemic, the majority of local governments seemed to be treading water and holding out for a change in the recycling market by redirecting general funds or imposing temporary surcharges to keep their recycling programs operating. However, this situation may not last given the wide-spread and significant budget shortfalls at the local level due to COVID-19.

Public education campaigns to raise awareness of the proper way to recycle play a large role in sustaining recycling programs in communities across the country. Local governments support public education designed to promote participation in activities that reduce the volume and toxicity of MSW and the proper diversion of recyclable materials. Additionally, local governments support the creation of effective producer-led reduction, reuse and recycling programs to address a product's life cycle impacts from design through end of life management, without relying solely on state and local governments.

With the current state of local recycling programs and the current fiscal realities for local governments struggling during the coronavirus pandemic in mind, we offer the following comments on the three key objectives of the Draft Strategy. These objectives have been continually underscored and reaffirmed by local governments and other stakeholders as the primary areas of need to address the challenges facing our recycling system. We further offer an additional opportunity for federal action.

### **Objective 1: Reduce Contamination in the Recycling Stream**

Local governments fully support the Draft Strategy's first objective to reduce contamination in recycling streams, which will enable more material to be recycled and processed in a more cost-effective manner and which result in more marketable end-products. We believe that developing consistent and educational messaging about the importance and value of recycling is mission

critical. Thoughtful and strategic recycling campaigns can better educate the public on recycling, boost participation and reduce contamination.

Local governments have gotten creative in public outreach efforts to raise awareness of their recycling services. For example, some have implemented radio campaigns on local stations to raise awareness and have seen an increase in the use of their services. Others have done flyers or created apps to educate residents and businesses about what can be recycled in their community. However, local government budgets are constrained in their ability to conduct regular marketing and outreach. To assist with these local efforts, local leaders encourage product manufacturers, as well as the federal government, to help amplify messages that would be applicable nationwide. For example, not throwing plastic bags, batteries or containers with food into recycling bins would be extremely useful; or the importance of “closing the loop” by purchasing products that have post-consumer content. These messages could be very helpful in supplementing efforts at the local level.

### **Objective 2: Increase Processing Efficiency**

Local governments are taking innovative approaches to improve and sustain their own recycling systems. Municipalities are dedicated to maintaining a clean commodity stream to provide as much value as possible, while also ensuring the cost-effectiveness of their recycling programs. Local governments have made investments in sorting technologies, including robotic and optical sorting. Robotic sorting uses artificial intelligence-assisted robotic technology to sort recyclables from waste. Robots are guided by cameras and computer systems to recognize specific objects. Similarly, optical sorting is the automated process of sorting solid products using cameras and/or lasers. Depending on the types of sensors used and the software-driven intelligence of the image processing system, optical sorters can recognize objects' color, size, shape, structural properties and chemical composition.

Further advancements in recycling technologies will improve the quality of recycled materials nationwide. However, it is important to acknowledge that most local governments are not in a financial position to make large, initial investments to build new recycling infrastructure, update existing infrastructure or purchase costly technology. Therefore, any assistance with increasing processing efficiency, retrofitting existing materials recovery facilities (MRFs), or applying new technologies would be welcomed at the local level.

### **Objective 3: Improve Markets**

Local government recycling programs are more likely to be successful if the materials collected are profitable. If the program can become self-funded through revenue and user fees, local governments can continue to improve recycling services and potentially expand their services to wider markets.

Unfortunately, local governments face a dismal marketplace that is valuing recycled materials at historic lows. In the beginning of 2020, the national average of sorted mixed papers, such as newspapers, magazines and writing paper, is being traded at roughly \$10 per ton. Two years ago, the same products were traded at \$104 per ton. The national average price for sorted, baled aluminum cans is traded at 55.44 cents per pound, compared to 75.81 per pound one year ago. This extreme level of devaluation of recycled goods has created serious challenges for municipal recycling programs and the ability to sustain operations.

Local governments support the creation of an interactive national map of existing recycling infrastructure to depict available recycling system capacity and available material will greatly improve the processing and access to the market. Local governments and the private sector will then have access to see which local recycling facilities have availability to receive recycled goods and which products are available to buy.

We ask the federal government to explore options for recognizing, encouraging or providing incentives to manufacturers to develop more sustainable products, such as supporting waste minimization efforts, establishing take back programs or using post-consumer content materials. Local governments encourage manufacturers to think about environmental considerations when designing products and to buy post-consumer content materials that are collected by local governments in order to have a sustainable, closed-loop system.

The recent restrictions placed on recycled goods by China has lowered the price of commodities, which creates additional challenges and considerations. At the local level, we look toward innovating solutions to address the needs of our communities. Today's challenges should be viewed as an opportunity to fix problems and inconsistencies and build a robust and sustainable recycling system throughout the country.

### **Additional Opportunity for Federal Action**

*Recommendation: Develop a national program to ensure that recycling labels for packaging are based on a set of clear and verifiable definitions and standards.*

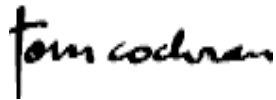
Local governments recommend establishing federal guidance on the types of plastics and other products that are recyclable in order to facilitate the processing of MSW and recycled goods more efficiently and at a lower cost to municipalities. While many products have the easily-identified "recycling triangle," this does not necessarily indicate that the item is recyclable in every community and, in fact, may be turned away in the vast majority of systems. For example, most local governments have stopped processing plastic #6, a class of polystyrene plastics. However, most consumers see the "recycling triangle" or even the language printed on materials and assume that it should go in the recycling container. As a result, most MRFs have to sort and remove those materials which decreases efficiency, increases cost and potentially results in contaminated collected products whose value is decreased or rejected entirely. If we want to be successful in selling post-consumer recycled materials, contamination must be

minimized. Setting national standards on which plastics and other materials can be recycled and subsequently labeling those products correctly will reduce the local cost of administering MSW and recycling programs and reduce contamination.

In conclusion, local governments, as well as private haulers and operators of materials recovery facilities, are being forced to reevaluate their operations and policies in order to adapt and maintain viable municipal materials management systems. We urge EPA to move forward in finalizing the Draft Strategy to help achieve these common goals and create a better system for communities and residents. We also encourage EPA to continue their engagement with our member communities, the private sector and other interested parties to further this discussion as we move forward with improving our recycling and sustainability efforts.

If you have any questions, please contact Judy Sheahan at USCM ([jsheahan@usmayors.org](mailto:jsheahan@usmayors.org)), Carolyn Berndt at NLC ([berndt@nlc.org](mailto:berndt@nlc.org)), and Adam Pugh at NACo ([apugh@naco.org](mailto:apugh@naco.org)).

Sincerely,



Tom Cochran  
CEO and Executive Director  
The U.S. Conference of Mayors



Clarence E. Anthony  
CEO and Executive Director  
National League of Cities



Matthew Chase  
Executive Director  
National Association of Counties