

December 4, 2020

Dear U.S. EPA,

We are pleased to provide comments to the EPA on the *Draft National Recycling Strategy: EPA-HQ-OLEM-2020-0462*. The Alliance for Mission-Based Recyclers (AMBR) represents the original four pioneers of mission-driven, community-based nonprofit recycling and zero waste in the U.S.: Eureka Recycling (Minneapolis, MN), Eco-Cycle (Boulder, CO), Ecology Center (Berkeley, CA), and Recycle Ann Arbor (Ann Arbor, MI). Our comments reflect more than four decades of experience in building model community-based recycling programs in the U.S.

We are excited to see renewed leadership at the EPA to improve recycling, but we are disappointed to see many of the same ideas from decades ago re-emerging in this strategy. What we have learned in the past few decades, and especially in the past three years, is that **voluntary initiatives and residential education programs are not enough to transform recycling into a financially sustainable, accessible system that drives toward a circular economy and a zero waste future**. The EPA strategy needs to evolve to the new realities of the U.S. recycling system and focus in these areas, in order of priority:

- Funding for and greater integration of recycling with national climate, environmental justice and healthy community initiatives, and for organizations working in those communities most detrimentally impacted by our current production facilities and waste infrastructure. Environmental justice principles must be integrated into all decision making;
- Policies and funding for market development that serves local and regional needs, starting with aggressive federal procurement directives to drive demand for recycled materials;
- Clearinghouse of best practices in business and residential reuse, reduction and recycling education with a focus on underserved communities and using tools created by people within underserved communities.

#### **PRIORITIZE ENVIRONMENTAL AND SOCIAL JUSTICE INTO ALL DECISION MAKING**

Our linear economy disproportionately negatively impacts BIPOC and low-income neighborhoods through the extraction and processing of raw materials, transportation of goods, and landfilling or incinerating our discards. This has for many decades and continues today to result in significantly higher incidence of disease and death for individuals in BIPOC and low-income neighborhoods. We cannot allow this to continue. EPA must integrate principles of environmental and social justice into our *National Recycling Strategy* and must intentionally involve and partner with communities of color, disenfranchised or otherwise disproportionately affected groups as key decision-makers.

#### **END MARKET OBJECTIVE: LEVERAGE GOVERNMENT PROCUREMENT**

Of the three proposed objectives in the *Strategy, Objective 3: Improve End Markets*, is the most practical work that the EPA can and must do. Recycling is driven by market demand for the recycled feedstock and more consistent increased domestic demand for recycled materials will strengthen the collection and sorting processes that drive recycling. A stronger domestic recycling market will support local communities by creating more jobs and providing the U.S. economy with greater resilience to market



disruptions. This also transitions us toward a circular economy where recycled feedstocks are the primary supply chain for new products. Further, increasing the recycled content of products and packaging is a proven strategy to reduce the environmental impact of the product, which drives at the underlying goals of recycling: to reduce climate emissions, protect our clean air and water, conserve resources, protect ecosystems and natural habitats, reduce the negative social impacts of our production processes, and create green jobs. The EPA should prioritize locally and regionally owned recovery infrastructure and remanufacturing businesses as part of its market development work to support even greater reductions in climate emissions and to keep as much of the money flowing within the local economy as possible, leading to the greatest local economic benefits.

The federal government is the nation's largest purchasing power and government procurement is an effective way to drive markets, yet it is noticeably absent from this list. **Strong federal government procurement should be the primary strategy to pursue in Objective 3.** The federal government's purchasing of recycled paper in the mid-90s strengthened the nascent recycling industry and strong purchasing commitments today can have the same strong effect. Moreover, the tools and guidelines developed by the EPA can lead the way for state and local governments, and large corporations, to follow suit. This would collectively unleash billions of dollars in purchasing power and help level the playing field for recycled materials which have to compete against virgin feedstocks that receive heavy federal government subsidies for extraction. Purchasing policies and guidelines should not just give preference to recycled and recyclable/compostable materials, but first and foremost to reuseable or refillable packaging models to drive innovation in new delivery and packaging formats. Lastly, the EPA can also play a role in convening market development workshops and coordinating efforts across regions. There is a strong network of market development programs already across the country. EPA can amplify and coordinate these efforts, and may play a role in filling some gaps.

#### **FUNDING OBJECTIVE: SUPPORT TRANSITION TO EPR, GRANTS TO UNDERSERVED COMMUNITIES**

While government grants have been helpful for building recycling infrastructure over the past few decades, there is growing movement toward Extended Producer Responsibility (EPR) policies that require consumer goods companies to fund the recycling system. This is seen both in emerging state policies and in industry proposals. **Government funds should be used to support the transition to a producer-funded recycling program that is financially sustainable, transparent and accountable, efficient, supports the local infrastructure investments that have already been made, and is based on environmental outcomes.**

Further, **no federal funds should be used to fund investments or research and development for plastics to fuel or other waste-to-energy technologies** that do not move us toward a circular economy. Any strategies pursued under Section 2.3 should clearly state that materials must be recycled or reused, give strong preference to projects that promote highest and best use of materials, and exclude beneficial uses like alternate daily cover.

Any grants or funds made under Objective 2 should be focused on **supporting underserved communities and communities carrying the burden of hosting waste disposal facilities.** Any other

funding should be directed only toward projects that promote reuse and refill systems or truly advance circular recycling.

### **CONTAMINATION OBJECTIVE: FOCUS ON PRODUCT DESIGN AND LABELING OVER RESIDENTIAL EDUCATION**

While reducing contamination is an important goal to improving recycling, the best way to achieve this is not through more education for residents, but through simplifying and streamlining product design and labeling. **Designing products to be recyclable and more compatible with recycling, and improving product labelling, are essential to making recycling simpler and less frustrating for consumers and less costly to local communities.** Educating consumers before streamlining the process and improving systems will just make people more confused and frustrated that their recyclables are being landfilled. As mission-based recycling organizations, we have decades of experience in developing strong recycling education programs and have some of the cleanest recycling streams in the country, but our efforts simply cannot compete with the increased complexity of consumer goods, greenwashing messages from companies and lack of standardized and clear labeling. **The EPA plays an important role in regulating product design standards, labeling, and certification at the national level.** It will be easier and less costly for manufacturers to comply with national policy, and it will be less costly to administer than a patchwork of state regulations.

As the *Strategy* mentions, there are already effective tools and methods available to improve recycling education. The EPA should not recreate the wheel on these proven approaches. Rather, the EPA can act as a clearinghouse for these best practices and provide funding and stakeholder engagement to drive adoption of these tools. Strategy 1.2.4 to develop a clearinghouse on best practices in education, policy and funding is by far the most valuable strategy considered under this category.

Central to this clearinghouse should be a **focus on outreach and education to underserved communities.** It is disappointing to see no mention of inclusivity in the education strategy. While providing a common set of messages is useful, there need to be multiple sets of messaging with themes that are culturally resonate with different groups and tools for how communities can determine which messages are most appropriate for their local situations and/or how to determine appropriate messages for their local cultures. If these resources do not exist, then EPA should lead on developing and/or funding the creation of these resources, with an emphasis on tools created by marginalized and underserved communities.

Lastly, this clearinghouse can include messaging on the economic benefits of recycling and its contribution to building more resilient local economies and domestic supply chains. Many states have reports on the economic impacts of recycling but work is needed to create stronger messaging based on these data sets and to build calculator tools or other resources to estimate local impacts. Incorporating the economic data into WARM is a good starting point and more can be done to help communities easily convey the economic opportunities in recovering resources.

### **SUPPORT FOR CONTINUED DATA STANDARDS**



Strategy 2.5 would develop national definitions, measures, targets and other data points. EPA leadership to improve measurement has been and will continue to be very helpful to state and local governments. This data collection must include waste generation per capita with the goal of reducing overall generation and the amount of waste sent to landfills and incinerators. The recycling rate is becoming a problematic metric and is losing favor in states that are moving toward waste generation and waste disposal per capita as more effective tools.

### **ADDITIONAL RECOMMENDATIONS**

We recommend the following additions to the National Recycling Strategy to further accelerate our transition to a just, circular economy:

- **Prioritize source reduction and reuse.** The proposed *National Recycling Strategy* recognizes the importance of source reduction and reuse, but refers these issues to the EPA’s work around SMM. While the EPA has led some strong work on reducing food waste under the SMM platform, source reduction and reuse are essential solutions to improving environmental and public health and transitioning to a regenerative, circular economy. Recycling is complementary to these solutions but secondary and not separate, and the reuse, source reduction and recycling should be deeply intertwined in any national strategy. We strongly urge the EPA to create a new objective under the proposed strategy aimed at expanding source reduction as well as reuse policies and infrastructure.
- **Integrate recycling with national climate initiatives.** Some of the most impactful tools the EPA has developed over the past decade have focused on the impacts of recycling on reducing carbon pollution. These include the WARM model, the 2009 report, [“Opportunities to Reduce Greenhouse Gases through Sustainable Materials Management and Land Management Practices,”](#) and the [West Coast Climate and Materials Forum](#). More work is needed to continue to advance recycling, composting and source reduction as some of the fastest, most cost effective local strategies to reduce carbon emissions. This includes updating the 2009 report and developing tools to quantify consumption-related emissions in local, state and national climate action plans.
- **Launch a coordinated national research partnership with universities.** Universities offer a tremendous opportunity to conduct research and develop new technologies to improve recycling operations and advance product redesign, as well as being testing grounds for new reuse and refill delivery systems. There are some city and state-level collaborations with universities already that serve as good models, including a recent initiative in the [state of New York](#) to work with three universities to research and improve recycling in the state, through infrastructure, education and policies; and [Portland State University](#)’s long-standing program to support waste reduction and recycling in the metro Portland area. A nationally-coordinated, EPA-led program could rapidly accelerate many of the solutions needed to advance recycling and create the next generation of leaders versed in and working toward a circular economy.



We thank you for your consideration of our comments and please feel free to contact us with questions or for further information.

Yours in zero waste,

A handwritten signature in black ink that reads "Kate Bailey". The signature is written in a cursive, flowing style.

Kate Bailey  
Policy & Research Director, Eco-Cycle, on behalf of AMBR members

