



December 3, 2020

U. S. Environmental Protection Agency
Federal Docket: EPA-HQ-OLEM-2020-0462

Terri L. Goldberg
Executive Director

Subject: Proposed National Recycling Strategy and Framework

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Dear Sir or Madam:

The Northeast Waste Management Officials' Association (NEWMOA) appreciates the opportunity to comment on EPA's proposed "National Recycling Strategy and Framework for Advancing the U.S. Recycling System" as published on EPA's website at <https://www.epa.gov/americarecycles/national-recycling-strategy-and-framework-advancing-us-recycling-system>. We applaud EPA for taking leadership in drafting this proposal and providing an opportunity for stakeholders to comment on it, and we appreciate your willingness to consider our suggestions. The comments outlined below represent the views of NEWMOA's members. We hope that our recommendations will help to improve and clarify EPA's proposal.

Overall, NEWMOA's members agree that contamination, recycling markets, and infrastructure are key challenges in the U.S. recycling system and that national leadership by EPA to address those challenges is necessary and important. Our members believe that the highest national priority under the proposed strategy should be improving the markets for recyclables; contamination of the recycling stream is a challenge that is affecting those markets.

NEWMOA's overall concern about the proposed strategy and framework is the lack of clarity about how the plan would be implemented and support an economically sustainable recycling system. State solid waste authorities play a major role in the oversight and implementation of solid waste recycling programs and should be actively represented and involved in the implementation of any national recycling strategy. Municipalities manage the services on the ground, and their budgets are severely constrained, and cannot be expected to fund the needed infrastructure improvements. The increase in recycling costs have exacerbated their financial challenges. Under normal circumstances, and particularly now during the pandemic, these local and state programs are understaffed and lack adequate resources to implement their mandates and provide effective services. For them to take an active role in the proposed national strategy would require additional resources.



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NEWMOA believes that the U.S. needs to consider alternative recycling policies to advance and increase recycling, improve efficiency in the system, and relieve local and state budgets. A national bottle bill, separate collection of glass, national mandatory minimum post-consumer recycled content standards, and bans on such materials as styrofoam and single use plastic bags are a few examples of national policy approaches that would be effective at improving our national recycling system. NEWMOA also encourages EPA to consider the potential role of national extended producer responsibility (EPR) programs. State and municipal recycling programs have no control over the materials in municipal solid waste, which are rapidly changing, particularly the materials in packaging. The manufacturers and brand owners, who make the decisions about the content of their products and packaging, should play a much more significant role in their management at end-of-life. We believe that EPR approaches offer solutions that engage manufacturers and brands in financing collection and management of the recycling of their products. A nationally consistent approach to EPR for packaging and paper products and other materials in municipal solid waste would be preferable to a patchwork of state laws and programs. EPR programs can be complemented by the other policy strategies listed above and where applicable, assisted by landfill/disposal bans.

While EPA's proposed strategy focuses on recycling, which is important, we believe that it would be enhanced by the integration of source reduction and reuse. These are equally critical and economically important approaches to reducing disposal of solid waste.

NEWMOA's members have been funding and developing effective education, outreach, and enforcement programs to address contamination of the recycling stream, particularly over the past few years. However, certain underserved and environmental justice communities are affected by gaps in recycling access and services as well as issues with contamination. EPA's strategy does not identify actions to address the needs of these disadvantaged populations.

Similarly, with regard to its scope, EPA's proposal appears to focus on the typical municipal solid waste materials – paper, plastic, metal, and glass – that are collected through curbside or transfer station programs. However, there are many other recyclables in residential and commercial solid waste, particularly construction and demolition materials and textiles. Further, aside from a mention in the appendices, EPA's proposal does not comprehensively address organics, such as food and yard waste. Reducing and diverting organics to composting and anaerobic digestion is a high priority for the solid waste programs in the Northeast. We urge EPA to develop a national strategy to advance these approaches as well. In addition, the proposed strategy does not address new waste streams from such emerging technologies as solar panels, wind turbines, lithium ion batteries, propane tanks, and many more. Our state and local programs are struggling with developing strategies to properly collect and recycle these newer waste streams and urge EPA to consider working with state programs to address these materials in its national strategy.

NEWMOA is a non-profit, non-partisan interstate association that was established by the governors of the New England states as an official interstate regional organization, in accordance with Section 1005 of the federal Resource Conservation and Recovery Act (RCRA), to coordinate in interstate hazardous and solid waste activities. The organization was formally recognized by the U.S. EPA in 1986. NEWMOA membership is composed of the state environment agency programs that address pollution prevention, toxics use reduction, sustainability, materials management, hazardous waste, solid waste, emergency response, waste site cleanup, underground storage tanks, and related environmental challenges in Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont. NEWMOA provides a strategic forum for effectively solving environmental problems through collaborative regional initiatives that advance pollution prevention and sustainability, promote safer alternatives to toxic materials in products, identify and assess emerging contaminants, facilitate adaptation to climate change, mitigate greenhouse gas sources, promote reuse and recycling of wastes and diversion of organics, support proper management of hazardous and solid wastes, and facilitate clean-up of contaminant releases to the environment. For more information on NEWMOA, visit www.newmoa.org.

NEWMOA appreciates your consideration of the concerns and suggestions outlined in this letter. Terri Goldberg, NEWMOA's Executive Director, will be happy to discuss next steps. She can be reached by email (tgoldberg@newmoa.org) or by telephone (617-367-8558 x302).

Sincerely,

A handwritten signature in blue ink that reads "Mike R. Hastry". The signature is fluid and cursive, with a long horizontal stroke at the end.

Mike Hastry, NJ DEP
NEWMOA FY 2021 Chair