

U.S. Environmental Protection Agency National Recycling Strategy: Institute of Scrap Recycling Industries Comments



Walter Wright, Jr.
wwright@mwlaw.com
(501) 688.8839

01/18/2021

The Institute of Scrap Recycling Industries (“ISRI”) submitted October 2nd comments to the United States Environmental Protection Agency (“EPA”) on the agency’s draft National Recycling Strategy (“Strategy”).

EPA released the Strategy for comment on October 5th.

The Strategy is described by EPA as identifying strategic objectives and actions needed to create a stronger, more resilient, and cost-effective United States municipal solid waste recycling system.

ISRI initially notes that it fully supports EPA’s work to establish National Recycling Goals and the companion National Recycling Strategy. The organization’s principal comments include:

- Need for Clarity and Definitions in Scope of the Draft National Recycling Strategy
- Recyclables are Not Waste and Recycling is not Waste Management
- Includes suggested definitions for:
 - recycling,
 - recyclable, materials recovery facility,
 - contamination, and
 - collection
- Reduce Contamination in the Recycling Stream
- Increase Processing Efficiency
- Improve Markets
- Conduct market development workshops and dialogues to spur market development for recycled materials, educate stakeholders on the value of secondary materials, and identify solutions to recycling system challenges.
- Produce an analysis of different types of end markets that considers resilience, environmental benefits, and other relevant factors for decision makers.
- Increase data availability and transparency about recyclable materials generated and the materials manufacturers need.
- Increase manufacturing use of feedstocks in the regions where they are generated.
- Increase demand for recycled materials through policies, programs, initiatives, and incentives, focusing on materials with less mature markets.

A copy of the comments can be downloaded [here](#).

