

Differentiating Scrap and Solid Waste: Institute of Scrap Recycling Industry's Comments on Proposed Updated Catalogue of Solid Wastes Forbidden to Import into China



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

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The Institute of Scrap Recycling Industry ("ISRI") on August 28th announced it submitted comments to the World Trade Organization ("WTO") and People's Republic of China in regards to China's intent to update its Catalogue of Solid Wastes Forbidden to Import into China.

ISRI describes itself as a trade association encompassing 1300 companies whose members include manufacturers and processors, brokers and industrial consumers of scrap commodities, including ferrous and nonferrous metals, paper, electronics, rubber, plastics, glass and textiles.

As ISRI has previously noted, China had notified WTO of its intent to ban the import of certain scrap materials by the end of the year. The issue is important to ISRI because the banned items are proposed to include most scrap plastics, mixed paper and slags and drosses.

ISRI states by way of introduction that it:

... fully supports the efforts of the Chinese Government to improve environmental protection and standards within its domestic recycling infrastructure. However, we disagree that a ban on the import of specification-grade scrap materials will help with those efforts. The Notification provided to the WTO includes within the scope of "solid wastes" to be prohibited by China certain recovered papers, plastics and metals that are produced within the United States to a specification-grade and then exported to manufacturers in China to be transformed into new products. These materials are very clearly valuable scrap commodities and not solid wastes.

As ISRI notes, China has significant importance in terms of scrap demand because of its status as the largest importer of such materials in the world.

ISRI comments place significant emphasis on differentiating scrap from solid waste noting:

Simply put, scrap is not waste. Waste – often called "trash", "refuse", or "garbage" – is a material that has no value and is not wanted. Wastes are disposed of because they are no longer useful. In contrast, Scrap – often called "recyclable material" or "secondary material" – is a valuable commodity sold in the global market place according to industry-wide, globally recognized specifications as a raw material in lieu of virgin materials for manufacturing.

The comments further note that:

- Scrap is a product sold in the open market in competition with virgin materials
- Scrap is processed to one of hundreds of specification grades
- It is a commodity with specifications that are used by industry members to facilitate the buying and selling of the materials (and by customs officials for customs clearing purposes)

The remainder of the comments contain a number of suggested modifications to the Catalogue's text.

[A copy of ISRI's comments can be downloaded here.](#)