

Proposed Revisions to China Solid Waste Law: Institute of Scrap Recycling Industries Comments



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The Institute of Scrap Recycling Industries (“ISRI”) submitted August 17th comments on China’s proposed revisions to its solid waste law (“Law”).

The country is proposing to revise its Law for the stated purpose of environmental improvement, including the use of regulatory requirements which could potentially affect its import of scrap.

ISRI’s comments were submitted to the Ministry of Ecology and Environment in Beijing.

By way of summary, ISRI stated that it found in the Law inconsistent uses of the words for “solid waste,” “trash,” and “recyclable materials.”

Specific points put forth in the ISRI comments include:

- Support for the identification of the needs for manufacturers to design packaging materials and film coverings that are easy to recycle (noting ISRI’s support for Design for Recycling)
- Noting a need for clarity as to when a material is considered a raw material as opposed to solid waste (which would subject such materials to the import restriction)
- Noting that under the definition of solid waste it is not clear whether “scrap” is encompassed (noting such materials are not discarded or abandoned, and since they are recovered for recycling they are not at the end of the useful life, although they may be at the end of their original use)
- A request that it be clarified in writing the distinction between what is trash (i.e., solid waste) and what is scrap (i.e., raw material) (Noting United States law specifically exempts scrap from the definition of solid waste)
- Stating scrap is a valuable commodity relied upon by manufacturers around the world as a competitive, environmentally preferable and energy efficient feedstock material
- Noting scrap is beneficial to the environment
- Noting the importance of banning certain solid waste but believes this should not include responsibly prepared scrap meeting globally-recognized specifications

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