



Association of New Jersey Recyclers

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December 3, 2020

Meghan Radtke
Office of Resource Conservation and Recovery
Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460

Re: Comments on EPA's Proposed National Recycling Strategy

Dear Ms. Radtke,

Thank you for the opportunity to comment on the draft "National Recycling Strategy". The Association of New Jersey Recyclers (ANJR) is very pleased to see EPA taking the lead in developing a more robust national recycling system, considering the hardships our programs across the Country have suffered over the last few years. We further recognize your efforts as complementing and advancing the excellent "Sustainable Materials Management Program Strategic Plan" (SMMP) platform developed for Fiscal Years 2017 – 2022 back in October of 2015. In essence, the proposed National Recycling Strategy seeks to take the next logical step for the country.

By way of background, the mission of ANJR is to support, promote and enhance source reduction, reuse practices, organics management, and recycling activities in the State of New Jersey. ANJR provides educational and training programs, and also advances policies that support sustainable materials management, which in turn benefits the environment, the communities and the economy of New Jersey. We are a not-for-profit, 501(c) (3), nonpartisan network that was incorporated in 1984. ANJR's members consist of individuals and organizations from both the public and private sectors, governmental entities, the recycling industry, and the business community.

ANJR believes very strongly, that the most important role of Federal Agencies is assisting Congress in developing effective national programs. To that, we offer the following comments:

Most important/best impact actions: While all three objectives of the Draft National Recycling Strategy are important, ANJR views Objective 2, and more



specifically, Objective 2.2 to be of primary importance. While national market development for recycled materials is a very close second, the real key to having an effective circular economy is rebuilding domestic recycling infrastructure. We lack effective competition in the marketplace and without it, the markets can name their price. Rebuilding domestic infrastructure will require incentives. It is our understanding that there are at least six pieces of proposed Federal Legislation proposed in Congress. The one piece that has moved through the US Senate is Save our Seas 2.0. Our understanding of this bill is that there is an authorization to utilize the “State Revolving Fund Loan Program” for zero interest loans to develop recycling infrastructure. Nearly all water and wastewater infrastructure in New Jersey has been financed through the “Environmental Infrastructure Trust” program, born of the State Revolving Fund Loan Program, https://www.nj.gov/dep/dwq/mface_njeifp.htm, that is administered by New Jersey Department of Environmental Protection and the New Jersey Water Bank. Since 1987, some 1,350 loans for critical wastewater and water supply projects totaling nearly \$7 billion in investment have been approved. We believe use of the State Revolving Fund Loan Program for new and enhanced recycling infrastructure would represent an outstanding approach to address national needs through a tried and true administrative format that works. While we understand that such an authorization will require an act of Congress, we recommend that USEPA assume a strong advocacy role to help educate the members of Congress on this potential funding vehicle. ANJR believes that all of the proposed actions in the draft Strategy are intertwined and therefore the success of this action will contribute to the success of both Objective 3 (Improve Markets) and the overall strength of our national recycling system.

Other important/best impact actions:

- One of the other important actions that is best suited for the federal government to undertake is the standardization of methodology used to calculate recycling rates across the Country (Objective 2.5). State recycling organizations and State Environmental Departments can provide their current calculation methods. ANJR believes this is an easy action to undertake and that ensuring consistency of rates across the Country will make it possible to compare the success of programs. ANJR also recommends exploring commercially available programs to capture those numbers used to calculate rates, such as the Re-Trac program. This work also logically builds upon and advances the

overarching measurement strategic priority focus outlined in the 2015 SMMP.

- The other action of importance to ANJR is Objection 3.5. Increasing demand for recycled materials through policies will also result in a more resilient domestic market system. ANJR is specifically recommending the EPA work with Congress on Federal recycled content legislation. In this regard, Senate 2515/Assembly 4676 are currently pending in the New Jersey Legislature and would represent model recycled content legislation. This bill closely tracks AB793 with respect to plastic beverage container recycled content which was signed into law by California Governor Gavin Newsom this past September. While these State efforts are significant, it is time for Congress to take up recycled content as a national initiative with guidance and advocacy from USEPA.
- ANJR also recommends EPA work to develop a National Extended Producer Responsibility Program (EPR). While Objective 2.4 does recommend encouraging “collaborative dialogues” between MRFs and manufacturers, it will likely take more than that given the financial bottom line of producing a product for manufacturers to take more consideration into the true recyclability of their product and its packaging. EPR programs will drive that collaboration. Once again, while National EPR will require Congressional mandate, EPA can play a crucial role both in providing technical assistance and advocacy in working with leadership in both houses. We view the establishment of EPR in the context of creating circular economies as a critical component of a comprehensive, national climate change mitigation platform.
- ANJR agrees with Objective 1.1.5 regarding consistency of labeling. ANJR recommends EPA consult with industry professionals and organizations to develop a template of recognized recycling colors (identifiers for material types) used for containers and dumpsters nationally. Recycling Partnership has done much of the research and work on this topic and EPA should coordinate with that group to adopt national labeling standards. Research shows that clear and consistent visual cues are essential for users to recycle properly.
- One last point is that rather than focus on materials with less mature markets, ANJR recommends focusing on materials that comprise the highest portion of the recycling stream.

ANJR is willing to collaborate on the above noted actions. ANJR members have historic knowledge of calculating New Jersey recycling rates. ANJR is a member of the New Jersey Markets Development Council as well as having an internal Markets Committee and would be happy to share that experience and knowledge as well.

Thank you for the opportunity to comment. Should you have any questions on our recommendations, please contact our Executive Director, Marie Kruzan by phone at 908-722-7575 or by email at anjr@optimum.net.

Sincerely,



Angela Andersen
President, Board of Directors

CC: ANJR Board

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