



Association of New Jersey Recyclers

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November 23, 2020

Catherine R. McCabe
Commissioner
New Jersey Department of Environmental Protection
401 E. State St.
7th Floor, East Wing
P.O. Box 402
Trenton, NJ 08625-0402

RE: Environmental Justice Rulemaking Stakeholder Process
Comments from the Association of New Jersey Recyclers

Dear Commissioner McCabe:

I reach out to you today on behalf of the Association of New Jersey Recyclers (ANJR) to offer comments to the Department as part of your environmental justice (EJ) rulemaking stakeholder process. ANJR carefully monitored the legislative process associated with the passage of A2212/S232 and has also participated in the Department's prior stakeholder discussions held over the past two months. At this time, we wish to offer formal comments for your consideration. We wish to thank you for this opportunity and to complement the Department on the extensive nature of the stakeholder process you have undertaken.

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 supports the Legislative declarations outlined in A2212/S232, particularly that no community should bear a disproportionate share of the adverse environmental and public health consequences that accompany the State's economic growth and that communities must have a meaningful opportunity to participate in the permitting process. However, we must raise some critical concerns which we hope the Department will carefully consider when developing its proposed EJ rulemaking.

As you undoubtedly know, the recycling industry in New Jersey has grown to employ some 27,000 people which adds almost \$6 Billion annually to our State economy. We have 22 Class A facilities which process curbside collected material, over 100 NJDEP Class B facilities accepting concrete rubble, asphalt debris, wood scrap and scrap tires, 38 Class C facilities



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