

Attachment—Additional Questions for the Record

**Subcommittee on Environment and Climate Change
Hearing on
“No Time to Waste: Solutions for America’s Broken Recycling System”
June 30, 2022**

Ms. Lynn Hoffman, Co-President, Eureka Recycling, National Coordinator,
Alliance of Mission Based Recyclers (AMBR)

The Honorable Jan Schakowsky (D-IL)

1. As noted in the December 2021 NASEM report, “Reckoning with the U.S. Role in Global Ocean Plastic Waste,” monitoring and assessments on plastic pollution will require more federal coordination, resources, and attention. Ensuring the work is strategic and targeted to support top interventions would benefit from being organized at a higher level of government, as has been done for a number of transboundary environmental challenges. Please describe the best next steps for the Federal government to advance this effort in 2022 and 2023.

RESPONSE:

We live in a global community where the products we use, the supply chains they rely on, and the discards and waste we generate often have long paths that cross many geographies. Meaningful interventions that will address our waste, climate, and social justice challenges (inextricably linked) need to happen at both the community, regional, and national level. Communities need the ability to shape solutions that are tailored to the unique problems they face, and to be supported and buoyed by national commitment and infrastructure. Standardized policies, coordination, and leadership at the federal level gives a critical foundation and allows for more efficient and effective community solutions.

The US could have big impact by joining the international community in battling toxic waste trade and illegal waste dumping through the ratification the Basel Convention.

The following policies would benefit greatly from federal action:

- **Truth in Labeling for Recycling:** national standards for labeling products and packaging would address confusion among residents, increase recycling rates by making the process more accessible and transparent, reduce contamination of recyclable materials, and make education efforts more cost-effective. For example, if we could truly trust that the recycling chasing-arrows symbol on a product meant that it could go in your recycling bin, it would simplify the process for individuals and reduce the need for complex education.

- **National Deposit Program:** a national container deposit system would help raise recycling rates, reduce waste, and support domestic supply chains. A national infrastructure would make compliance easier for producers and participants, rather than having different systems state to state.
- **National Reduction Goals & Recycling Content Mandates:** National standards and policies that support a robust and effective recycling system will allow the United States to better measure our impact and ensure movement towards [national reduction goals](#).
- **National Extended Producer Responsibility (EPR) system:** A strong national EPR system would transform the way we fund and improve recycling systems across this country and shift the burden away from the taxpayers by requiring producers to design their products to fit into existing systems and support the necessary infrastructure. A national system must be structured to be additive to communities that are leading the charge on waste reduction, and supportive for communities that are building from the ground up.

Passage of the Break Free From Plastic Pollution Act is an important next step towards addressing the above actions.

The Honorable Debbie Dingell (D-MI)

1. Michigan is one of the only Great Lakes states to enact a bottle deposit law that imposes a fee on certain plastic, aluminum, and glass containers. And this measure has proven to be highly effective. Consumers in Michigan return more than 90 percent of their bottles for recovery. The CLEAN Future Act and Break Free From Plastic Pollution both include a national bottle deposit program. Could a national bottle deposit program be an effective way to reduce waste?

RESPONSE:

A national bottle deposit program would effectively reduce waste, increase recycling rates, and support a domestic feedstock for our supply chain. Every year the United States loses \$5.1 billion worth of valuable materials when beverage containers are tossed out, ending up as litter or in landfills and incinerators ([Reloop, 2022](#)). Investing in policies that support a robust recycling system alongside a national deposit program, will capture these wasted materials and support a more stable economy that does not rely so heavily on virgin materials or international supply chains. Additionally, it is estimated that effective deposit return systems can reduce regional greenhouse gas emissions by about 550,000 metric tons, save cities & towns \$111—\$160 million, and create thousands of jobs ([Reloop, 2022](#)).

However, it is crucial that deposit return programs are intentionally designed. AMBR supports bottle deposit systems that include:

- A broad range of beverage containers, including all carbonated and non-carbonated beverages, all alcoholic beverages, dairy products, and aseptic cartons;
- A minimum 10-cent deposit on containers;
- The expansion of reusable and refillable beverage containers;
- A transition plan to help curbside recycling programs and MRFs with the loss of revenue from high value materials;
- Minimum recycled content standards to increase bottle-to-bottle recycling; and
- Fair and inclusive standards for informal workers ([learn more about informal workers](#)).

Finally, a thoughtfully designed national deposit program will be most effective when it is implemented as part of a holistic approach to waste reduction that includes recycled content mandates, labeling and design standards for packaging, incentives and targets for reuse and reduction, bans on the most problematic and unnecessary materials, and a robust national Extended Producer Responsibility (EPR) system.

2. In addition to being an environment tool, recycling, if done properly, can also strengthen our domestic supply chains. How can investing in the millions of tons of wasted material that we know can be recycled benefit domestic supply chains?

RESPONSE:

We are seeing unprecedented disruptions in global supply chains and increasing demand for recycled materials. Improving recycling improves the resilience and stability of our economy.

Recyclers are manufacturers. At Eureka recycling's MRF (Material Recovery Facility) and the hundred of MRFs around the country, we take a specific set of products that are designed to be recycled, sort them into standardized mixes of materials and create high-quality, consistent, valuable, regulated global commodities that we feed into the supply chain to be made into new products. Commodities produced at Eureka Recycling include glass, paper, cardboard, plastic, aluminum and steel. These commodities are used to make packaging, durable goods, and building materials that are in high demand and currently susceptible to international supply chain disruption.

During the worst of the pandemic, the recycling industry helped maintain America's manufacturing industry. Yet, because we have not fully invested in a strong recycling infrastructure, an overreliance on virgin products and foreign supply chains left us struggling to meet consumer needs. As reported by the EPA, recycling could be better leveraged to mitigate shortages of goods ([EPA 2020 REI Report](#)). By leveraging this domestic source of material, we can increase economic security while keeping valuable natural resources in the ground.

The Honorable Nanette Diaz Barragan (D-CA)

1. You make an important point in your testimony that the producers of products need to take responsibility for how easily they can be recycled, and work with recycling facilities to design products that can be recycled.
 - a. How does this lack of coordination impact your ability to sort and recover materials?

RESPONSE:

Currently, the onus to create a circular economy in the United States is on American citizens to recycle and Material Recovery Facilities (MRFs) to effectively and efficiently sort and process materials. Yet, the system is set up to fail because producers are constantly changing their packaging and using confusing and misleading labeling.

One of the greatest successes of the recycling movement in the United States is that it has become part of the daily lives of American households. Families want to recycle, but the lack of standardization and confusing labeling makes it nearly impossible for residents to determine what can be recycled and what cannot.

Simultaneously, MRFs, including Eureka Recycling, must make multi-million-dollar investments into equipment upgrades every couple of years just to keep up with the changing and evolving composition of packaging and products we receive—especially the ever-increasing amount of plastic—which further increases the costs of recycling programs for communities. Non-recyclable materials that come to MRFs via recycling bins cross-contaminate and decrease the value of recyclable materials, and cause unnecessary cost and safety concerns. Standardization and incentives for companies to design products and packaging to specifications that meet real recyclability metrics would make recycling easier, more efficient, and cost effective.

As it stands today, producers of packaging have no skin in the game when it comes to the end of life of the products and packaging they create. A strong EPR system would transform the way we fund and improve recycling systems across this country and shift the burden away from the taxpayers by requiring producers to design their products to fit into existing systems and support the necessary infrastructure.

- b. Why is it important to require manufacturing recycling standards in tandem with additional investments in recycling infrastructure?

RESPONSE:

There are currently no national standards for recycling nor are there packaging and product material standards. Producers are constantly changing their packaging composition. When this happens, the over 350 MRFs across the country are expected to adjust their business model, technology, and workforce to respond to the changing stream. If we only focus on investing in the recycling infrastructure while failing to standardize and regulate recycling standards, we will not build a sustainable recycling system and, in the end, waste money. We need to simultaneously create standards for packaging materials and products, develop clear labeling for consumers, move consumers and industry towards reduction and reuse/refill, and invest in our recycling infrastructure. This comprehensive approach will build a more resilient economy and healthier communities.

2. U.S. households are often confused about what they can recycle, what composting is, and how to reduce household waste. This can also be more challenging for communities where English is not their first language. What has been your experience with outreach to non-English speaking communities? Do you have recommendations that could make education materials more understandable for communities?

RESPONSE:

Public confusion about what can and cannot be recycled creates mistrust among consumers about recycling's effectiveness, leads to more recycled products being contaminated when mixed with nonrecyclables, and, ultimately, means more waste. There are several steps policymakers can take to inclusively address confusion about recycling and composting across US households, including:

- **Require Truth in Labeling:** Confusion about recycling stems, in large part, from misleading labeling. There is no federal law prohibiting producers from using the well-known chasing-arrows symbol on non-recyclable materials. Thus, we find producers using the symbol to make their products seem sustainable when in reality their packaging is contributing to our waste crisis. The "chasing arrow" symbol should only be used on products and packaging that is deemed recyclable - meaning it can efficiently

and cost-effectively be collected, sorted into a defined stream, and is in demand to be reclaimed as source material for manufacturing.

- **Create a national Extender Producer Responsibility (EPR) System:** as mentioned above, a national EPR system would shift the burden of determining what should and should not be recycled away from the taxpayers. Rather, producers would be incentivized to design recyclable products and packaging and industries would move away from single-use products. This, along with truth in labeling, would address confusion among consumers and better streamline the recycling process.
- **Fund Education & Outreach Programs:** Education aimed at non-English speaking communities should go beyond translations. Outreach and education should be targeted and customized for communities to directly address prevalent questions and community needs. At Eureka Recycling, we work with community groups in the Twin Cities to translate and design education materials for the three most commonly spoken languages – Spanish, Somali, and Hmong. Materials are better received and most effective when the design reflects cultural elements that community members identified such as photos of culturally specific food packaging.