



Innovative Products For **Home. Work. Life.**

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via electronic submission

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Subject: National Recycling Goal: Recycling Rate Measurement Methodology; Docket ID No. EPA-HQ-OLEM-2020-0443-0068

At the 2020 America Recycles Summit on November 17, 2020, the Environmental Protection Agency (EPA) announced the overall national recycling goal of increasing the U.S. recycling rate to 50% by 2030. This national goal will provide the benchmark to evaluate the success of the collective efforts to improve the nation's recycling system. The Household & Commercial Products Association¹ (HCPA) applauds EPA for taking the initiative to create a national strategy and improve our nation's recycling system. As part of the national strategy, it is critical to define how the recycle rate will be determined as it is essential that all stakeholders report their recycling rates in the exact same manner; otherwise, it will be impossible to determine the nation's true recycling rate.

HCPA represents a wide range of trusted and familiar household and commercial products depended upon by consumers and workers alike. These products utilize a range of technologies, including packaging, to function properly and is typically recyclable. Companies are dependent on the collection and processing by the recycling system to provide high quality recycled material which can then be used to manufacture new components for future products.

It is important that EPA embrace a holistic and robust definition of "recycling" that fully incorporates and accounts for the activities that comprise it. As such, recycling includes all processes through which waste is sustainably processed into new material for future products. There are several processes that should be included, such as mechanical recycling, which is the main recycling technology today, advanced recycling which is also referred to as chemical recycling, and organic recycling. Advanced recycling is the process whereby plastic waste is converted into chemical feedstocks and material products from pyrolysis, solvolysis, depolymerization and gasification. Chemical recycling technology

¹ The Household & Commercial Products Association (HCPA) is the premier trade association representing companies that manufacture and sell \$180 billion annually of trusted and familiar products used for cleaning, protecting, maintaining, and disinfecting homes and commercial environments. HCPA member companies employ 200,000 people in the U.S. whose work helps consumers and workers to create cleaner, healthier and more productive lives.

and markets are not yet mature. While developments are taking place, it will take several years before advanced recycling can be fully commercialized. Organic recycling (e.g., composting) is an option, however this requires better consumer education and improved collection and sorting schemes to avoid contamination of recycling streams for mechanical recycling and avoid the generation of microplastics. It should be utilized in a manner in which minimal plastic is used to divert organic wastes from landfill or incineration.

HCPA does not believe that the material management pathways reuse, repair, refurbishment, remanufacturing and donation should be included within the recycling rate calculation. While all of these pathways are important to reduce the generation of waste, these are not pathways that we consider to be recycling.

Household Hazardous Waste (HHW) should be included as a material stream for the recycling rate calculation. Products that present risks associated with HHW need to be properly handled for safe disposal; however, EPA should encourage the development of programs that can recycle the packaging once the product is emptied and the risk is managed.

Incinerating waste, including combustion with energy recovery, is a viable and already existing option to divert waste from going to landfills or leaking into the environment, like oceans and other aquatic systems, and reduces the primary resource consumption needed to supply energy. Incineration is a critical pathway for materials that are currently unrecyclable under our current recycling system; however, this should not be included within the calculation of determining the recycling rate. It will take many years to develop markets for certain types of recycled material, so energy recovery needs to be considered as a preferred option over landfills while those markets develop.

The national recycling rate should only include material that is recycled within the United States. For the United States to fully achieve the economic benefits of recycling, waste that is exported for recycling should not be included within the calculation. It is essential that the United States develop a strong domestic recycling system. While exporting waste to a country that will recycle the waste into new material is a preferable option to landfill, this should only be done if the ability to recycle the material does not exist within the United States.

HCPA appreciates the opportunity to offer these comments to EPA on the methodology for calculating the recycling rate within the United States and thanks the Agency for its leadership on this important issue. If you have any questions about the information provided in this letter, please contact me at ngeorges@thehcpa.org.

Sincerely,



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