EPA's 2030 recycling strategy turns focus to circular economy and environmental justice

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The U.S. EPA released its <u>National Recycling Strategy</u> on Monday, a roadmap for how the country aims to achieve a 50% recycling rate by 2030.

The final version, issued on America Recycles Day, includes five main objectives for making progress beyond the <u>current rate of 32%</u>. These include improving markets for recyclables, increasing and improving collection, reducing contamination in the stream and creating policies with a more holistic, circular economy approach that go beyond the recycling system. It also calls for standardizing measurement practices and increasing data collection needed to achieve the goal.

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The National Recycling Strategy is a long-awaited, much more detailed update to the EPA's recycling strategy <u>draft</u>, which the agency first released <u>during the Trump administration in</u> <u>2020</u>. Here are a few takeaways from the announcement:



There's a new emphasis on circular economy thinking and environmental justice

A major change from the draft is the plan's new focus on circular economy considerations. It mentions a new aim to reduce the climate impacts from the "production, consumption, use, and disposal of materials," which it says makes up about half of global greenhouse gas (GHG) emissions. This goal will go hand in hand with President Joe Biden's <u>commitment</u> to achieve a 50% to 52% reduction in economywide net GHG emissions from 2005 levels by 2030.

In the strategy document, the EPA drew connections between achieving acircular economy and environmental justice, saying the two aims are linked as foundations to create recycling systems that are "restorative or regenerative by design," Regan added in a note introducing the report.

Environmental justice is another of the Biden administration's key efforts and is a major priority under EPA Administrator Michael Regan. The draft document did not include any mentions of environmental justice or how waste and recycling systems may impact overburdened populations, but the version released Monday acknowledges that "waste management has long been associated with the environmental justice movement" since at least the 1980s. It stresses that infrastructure projects, research and improvement projects must involve stakeholders from low-income or so-called "environmental justice" communities.

"As we move forward with this strategy, EPA is committed to ensuring that historically underserved and overburdened communities share in the benefits that our work will deliver," Regan said in a statement after the plan was released. Regan added that the plan is intended to align with the investments outlined in the new infrastructure bill, which includes about <u>\$350 million in recycling-related provisions</u> "meant to help transform recycling and solid waste management across the country while creating jobs and strengthening our economy."

The agency has said the National Recycling Strategy is just one piece of this larger circular economy view, calling the document "part one" of a multi-step series to achieve a wide range of environmental goals.

"We realize that we can't recycle our way out of environmental problems. It's not enough to achieve the environmental impacts we need to attain," said Carlton Waterhouse, the EPA's deputy assistant administrator for the Office of Land and Emergency Management, during an America Recycles Day event hosted by the Institute of Scrap Recycling Industries.

In a statement, ISRI President Robin Wiener applauded the plan, saying "it notes that recycling is a part – or one of the tools – of a successful material management infrastructure, and it prioritizes both market demand for recycled commodities and the critical importance of designing products for recyclability."

David Biderman, CEO of the Solid Waste Association of North America, said in a statement he was pleased to see "that EPA has broadened the draft National Recycling Strategy to encompass climate change, environmental justice, and other topics."

After deliberation, chemical recycling gets a mention in the plan

The final version of the plan makes new reference to chemical recycling as a possible waste diversion strategy, a detail that was not mentioned in the draft version of the plan. The process uses techniques such as pyrolysis to break plastics down to their molecular level to be used for new plastic products or fuels.

It's also mentioned alongside landfills, incinerators, transfer stations and MRFs as infrastructure the EPA plans to study to determine whether such operations may disproportionately impact environmental justice communities.

The American Chemistry Council (ACC) applauded the inclusion of chemical recycling in the plan. Joshua Baca, ACC's vice president of plastics, said in a statement that its inclusion in the plan will make it possible to "transform plastic recycling rates in the United States" and called the method "critical for achieving a more circular economy for plastics." ACC has worked to <u>pass chemical recycling laws</u> in several states this year, but opponents of the practice, many of whom represent environmental groups, say the processes used to break down the plastics to their molecular level are not the right approach and may also have harmful effects on nearby communities.

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The EPA said "many" stakeholders submitted comments on whether to include chemical recycling in the scope of the strategy. "All options, including chemical recycling, should be discussed when considering methods for sustainably managing materials. Therefore, chemical recycling is part of the scope of this strategy and further discussion is welcome," the agency said in the document.

Elsewhere in the document, the EPA named numerous other policy drivers as worthy of future research and analysis, including recycled content requirements, take-backs, bottle bills, EPR, packaging fees, landfill fees, pay-as-you-throw models and minimum quality standards for MRFs. "Governments and other entities have adopted various policy approaches to address the challenges facing the recycling system. Conducting an analysis of different policies for their effectiveness could help inform decision makers nationally," it said.

The EPA still needs to create guidelines for measuring and tracking progress

The 2021 strategy document doesn't offer a plan for measuring or tracking the 2030 goal, but it does offer steps on how the agency plans to set the important recycling-related definitions and measurement practices it needs. EPA plans to work with stakeholders to create more consistent measurement methods to track recycling performance. "Measurement forms the bedrock of achieving the National Recycling Goal," the report states. "Different definitions and measurement practices create challenges to setting goals and tracking progress."

The to-do list includes creating recycling definitions, deciding on targets and performance indicators, and coordinating domestic and international measurement efforts. It also calls for improving transparency around collecting and sharing recycling-related data.

The report does not offer a timeline for checking these items off the list, but a footnote in the plan acknowledges that the EPA could "issue an updated Recycling Measurement Guide in 2022 and will then assess the national recycling goal."

Market development, contamination and infrastructure themes remain intact from the 2020 draft

When the EPA revealed its draft national strategy in 2020, it sketched out three main goals: reduce contamination, increase processing efficiency and improve markets. The final national strategy document offers more details on how to achieve these goals.

The contamination section of the 2021 strategy looks similar to what EPA first proposed in 2020, offering ideas such as better citizen recycling education, developing common recycling messages and avoiding misleading labeling. Heidi Sanborn, executive director of the National Stewardship Action Council, an advocate for legislation that fights misleading labeling, said in an email she was pleased to see the topic included in the plan. She added that public education efforts will fall short if labels don't match the realities of the recycling system. "There is no educating our way out of a confusing world of thousands of mislabeled/misleading products with many materials and resins," she said.

In an effort to improve collection and materials management, the EPA reiterated goals from the draft, such as creating a national map of existing recycling infrastructure to depict available recycling system capacity, then conducting a needs assessment to fill in gaps. It also reiterated the need for more public and private funding for R&D and infrastructure improvements, and called for creative ideas around making MRF processing operations more efficient.

To beef up markets, it suggests conducting market development workshops "to spur market development for recycled materials," as well as researching related opportunities for rural communities and supporting organizations and entities that help shape markets at a regional level.

There's much more to come

The EPA is billing the National Recycling Strategy as a starting point for a larger effort to address climate change from multiple angles. The strategy also mentions the agency's plans to coordinate with other federal agencies and stakeholders to release "subsequent strategies" beyond recycling. The plan's <u>appendix</u> section lists numerous federal agencies and other stakeholders that may be involved.

The EPA already has a goal to reduce food waste by 50% by 2030, which it <u>recently updated</u> to align with international guidelines. Now it also plans to create a separate climate impact reduction goal meant to examine how materials consumption affects climate change. The agency has said it also plans to work on reducing waste generation strategies.

Environmental advocates have criticized the national strategy for not making material reduction a bigger focus from the beginning. "It completely missed the boat by not starting with source reduction, reduce, reuse, refill and repair first," Sanborn said.

Further, the agency promised other work in topics such as:

- Sustainable product design
- Reuse strategies
- Strategies for other "key materials" such as plastics, food, cement and concrete, and electronics.

The National Recycling Strategy "should not be seen as an end but should just be seen as a beginning," Waterhouse said, adding that it's the first step in a set of policies meant "to address some of our biggest environmental challenges."

This story has been updated with outside insight from the National Stewardship Action Council.