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Aluminum Association Comments on the Draft US National Recycling Strategy, EPA-HQ-OLEM-2020-0462

The Aluminum Association appreciates the opportunity to provide input and comment on the EPA's draft *US National Recycling Strategy* as noticed on October 5, 2020.

The Aluminum Association represents U.S. aluminum recyclers, primary aluminum producers, and producers of fabricated aluminum products, as well as industry suppliers. Across the United States, Association members operate over 200 manufacturing and recycling facilities engaged in all facets of aluminum operations. Based on a 2020 analysis, the U.S. aluminum industry directly and indirectly accounts for 660,000 jobs and creates a domestic economic impact of \$172 billion.

Aluminum is a case study of recycling and the circular economy in action. Its light weight, corrosion resistance, ease of formability, and infinite recyclability without loss of attributes make it the sustainable material of choice for a wide variety of industrial, commercial, and consumer applications across the transportation, building and construction, electrical, and packaging industries. Specifically, in the consumer recycling space aluminum:

- Has the highest consumer recycling rate (50%) of any beverage container packaging material
- Has the highest recycled content (73%) of any beverage container packaging material
- Has the most economic value of any consumer recycled material (\$1317 per ton)
- Has the most efficient and mature end markets of any consumer recycled material
- Comprises only 3% of the weight of consumer curbside recycling container material but accounts for 48% of its economic value

Despite aluminum's leading sustainability position, there continues to be room for significant improvement in the consumer recycling of aluminum. For example, in the US over 45 billion aluminum cans worth over \$800 million in economic value are discarded annually. Similarly, recyclable aluminum foil is often discarded, and the Association is currently evaluating the aluminum foil recycling rate and strategies to improve it. However, the establishment of a *National Recycling Strategy* is an important step in capturing these lost economic and environmental values and in enhancing the circularity of all packaging materials, including aluminum.

The Association was an original signer of the America Recycles pledge in 2018 toward improving the nation's recycling system and has participated in subsequent workgroups formed to address specific recycling issues in the areas of measurement and metrics, consumer education, infrastructure, and markets.

In addition, the Association and several of its member companies actively participate with The Recycling Partnership and its Circular Economy Accelerator program toward providing consensus-based solutions to many of the challenges faced by recycling today.

Based on this deep involvement and ongoing commitments to enhancing the US recycling system, the Association is providing its perspective below on the draft National Recycling Strategy.

National Recycling Strategy

The Association endorses EPA's development of a national recycling strategy and its three supporting objectives. As noted in previous comments, the Association believes that the best measures to assess progress toward these objectives are:

- Residual rate for the contaminant reduction objective,
- Processing cost for the materials processing efficiency objective, and
- Recycled content for the market improvement objective.

EPA '50 by 30' Goal

The Association supports EPA's goal of a 50% consumer recycling rate by 2030 as announced by Administrator Wheeler during the recent 2020 America Recycles Week and recognizes the challenges this will involve to reach this goal from the current 32%, a 56% improvement in consumer recycling performance in the next 10 years. As noted above, aluminum is already a leader in consumer recycling but there is recognition that more can and must be done to recover more valuable aluminum back into the supply chain through recycling. Setting a national consumer recycling rate goal is a positive step toward focusing energy and attention on the improvements needed to recover additional aluminum and other recyclable materials.

Objective 1.2 Increase Coordination, Availability, and Accessibility of Information on Recycling Programs and Policies at the Federal, State, Tribal, and Local Levels.

Special Focus on Items with Unclear Recyclability

Due to lack of consumer clarity on the ability of certain items to be recycled, materials that cannot be recycled often end up in the recycling stream due to 'wish-cycling', and conversely recyclables can be lost to disposal when it is believed items cannot be recycled but in reality they can be. This situation results both from a patchwork of acceptance criteria across recycling jurisdictions and also from lack of consumer knowledge. In the case of aluminum, this often results with non-aluminum beverage can items such as foils, catering trays, pet food cans, and aerosol cans. The Association encourages EPA to work with stakeholders to develop and promote minimum national recyclability standards for materials that have unclear recyclability as a means to upgrade both the quality and quantity of material in the recycling stream.

Objective 2.1 Improve Understanding of Available Recycling Infrastructure and Needs

Special Focus on Recycling Infrastructure

It is difficult to make meaningful improvements in nationwide recycling infrastructure without first understanding the gaps and needs in the current system. Toward this end, the Association supports EPA's conduct of a nationwide recycling census of the current state of recycling infrastructure. In the case of aluminum, the aluminum beverage can value chain is already assessing opportunities to close gaps in the recycling system that currently prevent up to 25% of aluminum cans entering MRF's from making it out of MRF's and into an aluminum re-melting facility. This is a start, but more can be done with better knowledge that can be obtained through a nationwide assessment and a federal focus on improvements.

Objective 2.5 Develop and Implement National Recycling System Definitions, Measures, Targets, and Performance Indicators

Consumer Durables Recycling

At end-of-life, consumer durables constitute significant weight in the MSW system. However, due to limited availability of data about their recycling, the current EPA metrics assign the metals such as aluminum in consumer durables to disposal rather than recycling. In reality, a significant portion of the aluminum embedded in consumer durables is recycled and this mis-characterization results in an artificially low calculation by EPA of the consumer aluminum recycling rate. The Association encourages EPA to continue to work with the America Recycles measurement working group toward resolution of this situation that is not reflective of reality.

The Association is happy to provide these comments on the EPA's draft National Recycling Strategy and if you have any questions about them, please contact Curt Wells, the Association's Senior Director of Regulatory Affairs at 703-358-2976 (office), 804-385-6351 (cell) or cwells@aluminum.org (email).