

via email to ORCRMMeasurement@epa.gov

October 1, 2020

Cheryl Coleman
Director, Resource Conservation and Sustainability Division – 5306P
Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

RE: US National Recycling Goals

Dear Ms. Coleman:

The Aluminum Association appreciates the opportunity to provide input and comment on the EPA's Proposed *US National Recycling Goals* as noticed on September 2, 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. The U.S. aluminum industry directly and indirectly accounts for over 712,000 jobs and creates an economic impact of \$186 billion, which is just over 1% of U.S. GDP.

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. Consumer aluminum recycling is also enhanced through recycling awareness and educational programs as well as through an increase in Material Recovery Facility (MRF) capture rates and material quality with the use of improved processing equipment. Specifically, in the consumer recycling space, aluminum:

- Has the highest 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 an consumer recycled material
- Comprises only 3% of the weight of consumer recycling container material but accounts for 48% of its economic value

However, despite aluminum's leading sustainability position, there continues to be room for significant improvement in the consumer recycling space. 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. The establishment of *National Recycling Goals* is an opportunity to capture these lost economic and environmental values and enhance the circularity of all packaging materials, including aluminum, and the Association supports the effort. More specifically, the Association provides the comments below for EPA's consideration in setting and measuring against those goals:

System-Wide Recycling Measures to Assess Recycling Performance

The best metric to assess system-wide performance of recycling is the recycling rate – the percentage of the total amount of discarded or used materials generated that are utilized as feedstock for the manufacture of new products. This metric should be tracked across geographic parameters (national, state, local) as well as across material types (aluminum, steel, paper, glass, plastics, etc.) in order to determine recycling performance. Additionally, there is value in collecting information on the “recycling access rate” and the “capture rate” as secondary information to help with understanding trends in the overall recycling rate.

Reducing Contamination in the Recycling Stream

The best metric to assess contamination in the recycling stream is the residual rate – the percentage of materials coming out of a MRF that are not recyclable.

Increasing Materials Processing Efficiency

The best metric to assess materials processing efficiency is the processing cost – the per ton operating and capital costs for MRF’s to receive, separate, and prepare recyclable materials for end user markets. Economics drive the long-term viability of MRF operations, and tracking and minimization of processing cost is the single largest driver of that viability.

Strengthening the Market for Recycled Materials

The best metric to assess the strength of markets for recycled materials is recycled content – the percentage of recycled content within manufactured goods. Manufactured goods that contain a high percentage of recycled content are indicative of a well-functioning, economically viable market for valuable recycled materials.

Industrial Recycling

The Association notes that the national recycling goals initiative is exclusively consumer oriented. Once the consumer recycling goals and measurement methodologies are established, the Association encourages EPA to build on its experience with consumer recycling and consider a similar focus on select industrial streams for recycling.

Conclusion

The Association has been an active participant in EPA’s America Recycling Day activities, has signed the EPA Recycling Pledge, and engages regularly with EPA on a wide variety of recycling issues. As such, it is pleased to provide these comments on the EPA’s plans to establish national recycling goals and if you have any questions about the information provided above, please contact me at 703-358-2976 (office), 804385-6351 (cell) or cwells@aluminum.org (email).

Sincerely,



Curt Wells
Senior Director of Regulatory Affairs
The Aluminum Association