

## **Federal assistance for recycling and waste management**

We fully support Ramsey County's comments.

In an effort to meet the State of Minnesota's recycling goal and waste management objectives, Washington County is committed to ensuring residents and businesses have the opportunity to recycle. The county continues to invest by providing funding and technical assistance to support recycling programs within our cities, townships, and schools, and along with our neighbor, Ramsey County, offering grants to businesses and multi-unit dwellings to increase recycling opportunities.

Our residents and businesses support recycling and want to do the right thing. However, due to changing international and domestic recycling markets and changes to product materials (such as non-recyclable packaging), less and less of our waste is recyclable, and what is recyclable is costing more to be processed. The county supports developing markets for recyclables, and the vision that trash should be viewed as a commodity and not a waste. This is central to our work in the Ramsey/Washington Recycling & Energy's "More Value, Less Trash" philosophy.

Some specific ways to assist local governments, include:

- **Support for local market development**, both in the United States and as part of our local waste management system. Keeping recycling resources local is not only economical but also reduces greenhouse gas emissions.
- **Create a level playing field for recycled materials** versus virgin feedstock in manufactured materials and products. This could include revising federal policies that subsidize petroleum-based products to make them more economically appealing to use recycled feedstock.
- **Support for maximizing the recovery of e-waste/electronic materials** versus the extraction of virgin resources. Counties have an active role in the collection and market development of valuable metals and other materials found in electronics through household hazardous waste program. In 2019, Washington County collected nearly 1.3 million pounds of electronics from more than 70,000 participants at the Environmental Center. Participation continues to grow and we are in the process of selecting a site for a second Environmental Center for the northern area of our county and will be constructing that in the next several years.
- **Support federal recognition of solid waste as a renewable fuel** and support for waste and energy industries to use public and private solid waste facilities as part of their sustainable, renewable energy resource programs, including the production of biofuels.
- **Measurement of success for our waste system** that not only tracks by weight or disposal method based on the state's waste management hierarchy, but also monitors progress in reducing toxicity of waste, reuse, acknowledges connections with renewable energy production from the disposal method, and recognizes reduction of greenhouse gas emissions.

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## Ramsey and Washington Counties – Federal Actions to Support Local Recycling

### 1. Product Stewardship/Extended Producer Responsibility/Secondary Materials Management

There needs to be federal leadership on product stewardship with a national reach. All of these affect product design and serve to increase recycling.

- The state-by-state approach creates innovation, but many issues need to be addressed on a national level because the design, production, marketing and sales of many products is national (or international, which even more strongly argues for a national approach).
- Design for Recycling needs to have some force of law or rule, not just a voluntary initiative, to simplify the recyclability of products (particularly packaging) and especially to reduce the technical complexity and fractionalization of recycling processing (thereby reducing the cost of recycling).
- A national initiative should not be a race for the bottom, and states should have the ability to go above and beyond federal systems where threats to public health, safety, public budgets, social values and environment warrant.

### 2. Stronger Federal Support for Domestic Markets

More federal support for state or regional development of end-markets.

- Development of these markets will reduce transportation-related energy/GHG impacts, reduce shocks from sudden changes by foreign trading partners (China et al) and leverage economic value and business opportunities in the U.S.
- Support could include
  - grants to states/regions or for specific projects,
  - financial incentives to manufacturers (tax, grants, low-cost loans),
  - technical assistance to manufacturers to demonstrate how recycled feedstock can substitute for virgin feedstock, and
  - initiating or more strongly supporting existing forums for matchmaking of stakeholders (recycling processors, trade groups, manufacturers, financiers) to create new or stronger supply streams.

### 3. Increase demand for recycled content products

The federal government can play a stronger role in increasing demand for recycled material. Federal procurement guidelines have not kept up with the evolving waste stream and evolving recycled content product market, nor are they driving more private sector innovation to expand use of recycled content feedstock. It is not clear how agencies are accountable to assure actual purchases meet even current guidelines. There could also be more effort directed to states to adopt such guidelines for public purchasing, and set the bar for private entity purchasing as well. You can't fix "inefficiencies" in recycling without creating more demand for recycled content products and pulling recovered material into production.

### 4. Support Modernizing Recycling Processing

Provide financial assistance/incentives for development and technological enhancement of basic infrastructure like Material Recovery Facilities (MRFs) to operate more cost-effectively and improve output to meet more discerning end market requirements, and also for development of intermediate facilities like PRFs (or more capabilities in MRFs) to refine material streams and increase value and market options. Grants and market development expertise/assistance to states/regions are two tools EPA or others (Commerce?) could use.

5. **Create a more level playing field for recycled v. virgin feedstock**

Review federal policies that subsidize petroleum and fiber extraction and production in ways that make virgin plastic and paper feedstock more economically attractive to manufacturers than recycled feedstock. Look for opportunities to either reduce those subsidies (if it can be done in a meaningful way vis-à-vis the price competitiveness of recycled feedstock), or match those subsidies (or at least the effects of them) to the advantage of recycled feedstock in the waste stream “mining/extraction” and production process. Grant funds to the private sector or to the University of Minnesota, for example, could help with developing technology to address recycling opportunities for new and more complicated packaging.

6. **Measurement Matters and a Sustainable Materials Management Approach**

Recycling efforts have targeted the heaviest portions of the waste stream and success has largely been measured by tons recycled, or percentage of the waste stream recycled by weight. A life-cycle view of products needs to be a driver in prioritizing efforts around waste prevention, reuse, recycling and final management. Recyclability alone should not be the driver. We need to develop consistency at a national, state and local level on indicators and measurement methods so we can better tell the story of what success means and better identify where additional efforts are needed to achieve more meaningful results.