

Waste Management Position Policy Extended Producer Responsibility (EPR)

April 2020



POSITION

WM encourages governmental entities to first consider the importance of demand creation for recyclables to ensure that viable end markets support their use for manufacturing into new products and packages. EPR that fails to incorporate effective end market development policies will simply add cost to an already stressed system, without achieving net environmental benefits. Further, lifecycle analysis plays a critical role in how materials are managed dictating that the net environmental benefits of materials management are considered over simple recyclability. WM supports efforts to improve the demand and quality for recyclables through efforts such as post-consumer content legislation and funding for education and outreach. Efforts to improve recyclability through design are also important for the sustainable future of recycling.

Recognizing these important primary considerations, WM's position on EPR legislation is as follows:

WM supports well-written legislation for most "Hard-to-Handle" materials

Developing cost effective alternatives for collection and recycling of "Hard-to Handle" (HtH) materials such as paint, batteries, CFLs, electronic waste and carpet, requires a new funding and management system. A combination of the high cost of handling and the lack of market value for these materials, has ultimately resulted in a taxpayer/government funded service offering for these HtH materials.

WM supports the application of "Advanced Disposal Fees" (ADF) or "Eco-fees" placed on products/packages.

WM supports both visible eco-fees and imbedded fees (invisible to consumers) on packaging but prefers visible fees to send a message to consumers of the environmental cost of their purchases. The amount of an eco-fee can be modulated by material to drive behaviors, according to any number of factors including recyclability, recycled content, labeling, the impact of inks and adhesives, etc. The details around the distribution of funds will be critical to ensure equitable funding support of existing infrastructure, protection of local programs, and innovation.

WM may support brand-funded mechanisms to support recycling when local control, existing infrastructure and franchises are protected.

EPR that recognizes and uses existing infrastructure investments while maintaining local control and contracts/franchises for recycling collection/processing may be worth considering as a funding option for sustainable recycling. The recycling industry has invested billions of dollars in trucks, carts, and MRFs, and protecting these assets is important to continue to incentivize the industry to make improvements to recycling in the U.S. EPR has not been shown to be effective in developing end markets. WM opposes EPR schemes that relinquish control of recycling programs to producers in exchange for the producers taking on the costs of recycling.

EPR should not be implemented without primary consideration of end markets for recyclables and lifecycle assessment for optimized environmental benefits. Recycling is one of many pathways to reducing the environmental impact of products and packaging, but it is not **the** goal. Careful consideration of local economic conditions, social impacts, and environmental goals must all play into this important policy discussion.