

US EPA ARCHIVE DOCUMENT



*Sustainable Solutions to Protect Our Environment*

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July 23, 2009

Lisa Jackson  
Administrator  
U.S. Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Dear Ms. Jackson:

We are writing to request that US EPA take a leadership role in addressing one of the most critical environmental and economic issues facing communities around the country—a sustainable financing system for municipal recycling programs. Municipalities have traditionally had primary responsibility for implementing recycling programs throughout the country. Sustainable financing for their programs is essential to improving recycling and achieving US EPA's goals of conserving materials, reducing waste and combating climate change.

The Product Stewardship Institute (PSI) is a national non-profit environmental institute with membership from 45 states, over 100 local governments, and over 50 businesses, environmental groups, and organizations that establishes cooperative agreements to reduce the health and environmental impacts from consumer products. In discussing priorities for future action, our members have repeatedly raised the issue of stewardship for municipal recyclables, most notably packaging.

Community recycling programs have made tremendous strides in the last two decades leading to a significant increase in recycling rates – from 16 percent in 1990 to more than 30 percent in the past few years. The dramatic increases experienced in the 1990s have leveled off in this decade, in part due to limited funding for outreach, education, enforcement, and infrastructure improvements—all essential elements of a truly effective recycling program. We have reached this plateau at precisely the time when the commodity industries – paper, plastic, glass, aluminum, and steel – have all set ambitious goals for the use of recycled materials, reflecting their growing dependence on the expansion of recovery efforts.

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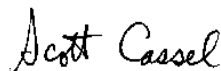
In most American communities, recycling programs compete for increasingly scarce local tax revenues with other critical public services, such as police and fire departments, libraries and schools. Many European and Asian countries and the Canadian provinces of Ontario, Quebec and soon Manitoba have implemented innovative policy approaches to finance municipal recycling programs outside of the local tax structure. Such policies have led to increased recycling rates and improved efficiency in local programs, while also helping to meet the needs of the commodity industries and the increasing commitment of consumer product companies to more environmentally sustainable packaging.

To address this critical issue, we request that you consider convening a multi-stakeholder dialogue to explore sustainable financing strategies for municipal recycling. Such a dialogue must involve representatives of state and local government, environmental organizations, and the manufacturers and retailers of the products and packaging that are managed in the municipal recycling stream (e.g., paper products and metal, glass and plastic containers). In doing so, the US EPA would provide a tremendous service to aid state and local governments around the country in moving forward to conserve resources and reduce waste. Such a dialogue would also ensure the achievement of EPA's Resource Conservation Challenge objectives and contribute significantly to its efforts on climate change.

PSI is willing and able to assist EPA in implementing this effort. With funding from EPA, PSI has convened multi-stakeholder dialogues on the management of paint, thermostats, fluorescent lamps, and phone books that have led to significant agreements, projects, and progress. Given the complicated nature of this critical issue, PSI could improve the productivity of the dialogue by coordinating state and local government participation as it moves forward.

Thank you for your attention to this important issue. I look forward to working with you to ensure a constructive dialogue to support municipal recycling programs.

Sincerely,



Scott Cassel  
Executive Director  
Product Stewardship Institute



Resa Dimino  
NYS Department of Environmental Conservation  
Board Member, Product Stewardship Institute

cc:

Mathy Stanislaus, Assistant Administrator, OSWER

Matt Hale, Director, Office of Resource Conservation and Recovery

Betsy Smidinger, Director, ORCR, Resource Conservation and Sustainability Division