

## ISRI Position on Product Stewardship<sup>1</sup>

Recycling in the United States depends upon a market-based system -- through which obsolete, previously used, off-specification, surplus, or incidentally produced materials are processed into specification-grade commodities and consumed as raw-material feedstock in lieu of virgin materials in the manufacture of new products.

The private sector recycling infrastructure in the U.S. touches almost every part of the economy – from retail stores, office complexes, residential neighborhoods and schools, to factories, industrial operations including construction and demolition sites, and even military bases. The vast majority of the recyclable material that flows through the privately owned non-taxpayer subsidized recycling industry does so without any problems and is transformed by recyclers into clean, high quality, commodity grade product.

ISRI does not support product stewardship policies that disrupt the current recycling infrastructure, such as extended producer responsibility programs that either target, include, or disrupt the recycling of materials or products that are being successfully recycled and consumed in existing markets.

ISRI encourages policy that incentivizes manufacturers to design their products for recycling, to use greater amounts of recycled content in manufacturing, and to use recyclable content in packaging, provided there are nonegative implications to the product's recyclability.

Increasingly, however, certain materials and consumer products are entering the residential recycling stream for which commodity markets do not currently exist, or the markets may be regional in nature and not be economically viable at the point of collection. There are also some recycling programs driven by government mandates or sustainability goals that are not supported solely by market values, and certain materials that were previously economical to recycle may no longer have viable end markets due to major changes in global commodity markets. These conditions create items that are difficult to recycle.

To address facilitation of the proper recycling of difficult to recycle items, ISRI supports consideration of policies that are temporary in nature to support markets for recycling of those items until the markets mature, and that require consumers and manufacturers to:

- Provide a collection mechanism for difficult to recycle items which could be accomplished through manufacturer facilitated collection systems developed in cooperation with retailers or other entities, and/or
- Compensate municipalities / recyclers for costs associated with separate collection, transportation, and processing systems for difficult to recycle items.

Further, should an EPR scheme be proposed in a state legislature for residential recycling that incorporates a producer responsibility organization (PRO) structure, to ensure ISRI has a seat at the table so as to protect the interests of the recycling industry, ISRI would evaluate the state's proposal for an EPR program and seek to ensure industry's interests are considered.

This position is one element of ISRI's policies and positions to address challenges and opportunities within the recycling industry.

---

<sup>1</sup> As adopted by the ISRI Board of Directors on July 16, 2021.