NATIONAL
RECYCLING
COALITION
INC.

POLICY POSITIONS

September 1992

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POLICY POSITIONS

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The National Recycling Coalition (NRC) is a nonprofit membership organization committed to the goals of maximizing recycling and conservation as integral components of waste and resource management. The NRC is an advocate for environmental protection, energy and resource conservation, and social and economic development through recycling and waste reduction.

NRC was formed in 1978 by a small group of recycling professionals; membership currently represents every region in the country. NRC's members are governments, nonprofit groups, grassroots recycling organizations, private businesses, and individuals committed to the NRC's goals.

The first NRC National Policy was developed by attendees at the Coalition's annual conference and adopted unanimously by over 500 members. Additional policy resolutions have been established in subsequent years.

The National Recycling Coalition Board of Directors reviews its policies on an annual basis, adding to or amending its policy positions to reflect current concerns in the areas of source reduction, recycling, composting and integrated solid waste management. This document includes all of the National Recycling Coalition's current policy positions. These policy positions are established as a tool to educate decision makers at the local, state and national level.

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WASTE REDUCTION STANDARDS

BASIC RECYCLING PRACTICES

Rationale

A goal of the National Recycling Coalition is to reduce waste production and then maximize recycling as an integral part of waste and resource management. This reduction-recycling approach will achieve the benefits of environmental protection, energy conservation, and social and economic development.

Policy

The National Recycling Coalition desires to promote waste reduction, materials reuse and recycling in its own operation. Actions taken to pursue these goals will include:

1) Purchase of durable products, such as mugs and reusable envelopes, rather than disposable products for the office.
2) Use of two-sided copies for all National Recycling Coalition mailings.
3) Use of recycled paper meeting, at a minimum, U.S. Environmental Protection Agency (EPA) guidelines, for all stationery, newsletters, copy paper, pads, business cards, and computer paper where possible. A message to that effect will be stated on the paper.
4) Use of no inks containing toxic components for any National Recycling Coalition publication,
5) Purchase and use of recyclable paper for the office. No yellow pads, pink message pads, or National Recycling Coalition paper will be used unless they can be recycled.
6) No use of toxic cleaners or sprays in the office.
7) Investigation by office staff of the use of plastic-less windowed envelopes rather than glued labels for mailings.
8) Single copies with routing slips within the office rather than multiple copies of memos.
9) Shift from material to electronic modes of communication.
10) Investment of National Recycling Coalition funds only in socially responsible funds.
11) At all National Recycling Coalition sponsored meetings and events, use of durable rather than disposable tableware for meals and snacks, with recycled collection points provided for recyclable goods generated in quantity at such functions.
12) For all Requests for Proposals issued for services, inclusion of the statement that the National Recycling Coalition prefers doing business with companies that adhere to our principles, and that any proposals submitted to us include the statement that "all proposals shall be printed two-sided on recycled and recyclable paper with removable, reusable bindings or staples."
13) Requirement that all contractors use recycled paper when producing reports for the National Recycling Coalition.

The National Recycling Coalition urges all staff and contractors to implement the above practices and follow the principles of waste reduction and materials reuse and recycling.

National Recycling Coalition staff shall make periodic reports to the Board of office actions related to the above policy and practices, and pass along this information to its members.

WASTE REDUCTION STANDARDS *(continued)*

The National Recycling Coalition desires to promote waste reduction, materials reuse and recycling with local and state governments. Actions recommended include:

- Reduce and reuse products to the maximum extent technically feasible. This includes using duplex copiers, plain paper faxes, durable products, and minimal packaging.
- Identify reusable or recyclable products (or less harmful, more environmentally sound products) that could replace single-use and non-recyclable products.
- Quantitatively summarize current purchasing patterns for reusable and recycled materials and products. Identify potential suppliers to the Purchasing Department's buyers.
- Prepare a guide to purchasing and use of reusable and recycled products for operating departments, including a list of available materials, how to obtain them, how to minimize cost, and how departments can adapt their operations and equipment to use recycled paper and other recycled materials.
- Prepare standard specifications that require, in government construction projects (including those done directly under contract or with the financial assistance of the government), that a minimum percentage of recycled materials (including asphalt, concrete, wood chips, humus, and compost) be utilized.
- Require in City grants, contracts, consultant agreements and other agreements that printed materials be on recycled paper and that other recycled products will be used to the degree available and practical. Also require all proposed vendors to certify that they have adopted, or will adopt within 12 months, a recycled products procurement policy applying throughout their firm or organization.

Cross-reference: Legislation and Regulation; Procurement; Education and Outreach

HIERARCHY OF WASTE MANAGEMENT PREFERENCES

Rationale

Source reduction and recycling can conserve energy and natural resources, create jobs and employment opportunities, and conserve landfill space. Other forms of waste disposal, such as waste-to-energy facilities and sanitary landfilling, are less preferable in terms of resource conservation and environmental protection.

Policy

The National Recycling Coalition endorses and supports a hierarchy of waste management preferences that gives first priority to source reduction, reuse, recycling, and composting to minimize the amount of waste to be otherwise managed.

Policies should also be adopted at local, state and federal levels of government to pursue an integrated waste management hierarchy of priorities for solving solid waste problems. Such a hierarchy should be established consisting of source reduction, recycling/composting, transformation (including all types of capital intensive processing techniques to convert wastes from one form to another, such as gasification) and disposal (landfill).

WASTE REDUCTION STANDARDS *(continued)*

NATIONAL MEASUREMENT STANDARDS FOR WASTE PRODUCTION & RECOVERY

The hierarchy should place primary emphasis on implementing all feasible source reduction, recycling and composting while not precluding communities from considering transformation facilities and landfills to address waste which cannot be reduced at the source, recycled or composted. Such a hierarchy should govern all solid waste policies, particularly the planning for and regulation of all waste facilities.

Rationale

The National Recycling Coalition's National Recycling Measurement Standards and Guidelines were created as an essential first step toward the establishment of local, state and federal methods of measuring recycling rates. The National Recycling Coalition is now looking to the federal government to assist in the next steps required to further these goals.

Policy

The federal government should direct the U.S. Environmental Protection Agency (EPA) to develop a nationally uniform system for state and local governments to measure waste production and recycling rates.

Definitions of solid waste, municipal solid waste, recyclables, recycled and related terms should be standardized nationally. Based on these definitions, guidelines for measuring quantities of solid waste, materials recycled and materials composted should be developed within a year by the EPA.

The National Recycling Coalition's National Recycling Measurement Standards and Guidelines should be used as the basis for this definition and measurement system. The EPA should also pay special attention to characterizing and quantifying waste production patterns.

NATIONAL DATABASE ON RECYCLING CAPACITY

Rationale

The National Recycling Coalition emphasizes the need for sharing information, and calls for "National leadership for Research and Development and Technology Transfer." It also cites the need for "...the establishment of a national publicly accessible computerized recycling database to provide an annual report on the national rate for recycling of all commodities recycled from the municipal solid waste stream as defined in RCRA. The National Recycling Coalition is looking to refine and further this goal and to support steps that will implement it.

Policy

The federal government should establish a national database that includes information on existing and proposed recycling capacity. At minimum, the commodities to be tracked in this database should quantify the generation (total material generated that could eventually be supplied), supply (total material collected, processed and available for delivery to an end market) and the demand (projected end markets for each reclaimed material) for each commodity, by application and grade. Applications and grades must be clearly defined within each commodity category.

WASTE REDUCTION STANDARDS *(continued)*

Purchasers of recovered paper, plastic, glass, metal and other commodities should continue to publish specifications for recovered materials by grade and should expand educational efforts to inform processors, handlers and manufacturers about materials that interfere with the recycling process. Nationally uniform guidelines and specifications should be developed for these commodities. This information should be included in the national database.

Cross-reference: Legislation and Regulation; Education and Outreach

NATIONAL WASTE REDUCTION GOALS

Rationale

Source reduction, recycling, and recovered material utilization can be encouraged on the local and state levels through the establishment of national goals. The establishment of national goals will define the importance of waste prevention and recycling for both the public and private sector.

Policy

The federal government should direct the EPA to establish aggressive, achievable national source reduction, recycling and recovered material utilization goals where recycling goals and utilization goals are in balance. States should be required to annually report their progress in meeting national recycling goals.

Cross-reference: Legislation and Regulation (RCRA Reauthorization)

RESEARCH & DEVELOPMENT & TECHNOLOGY TRANSFER

Rationale

Research, development and transfer of technology is needed within industry, commerce and all levels of government for uses of recycled, recyclable, secondary and waste materials as the feedstock of industry. These technologies will result in less dependency on limited and virgin resources by promoting the use of renewable, reusable and recyclable materials, as well as developing substitute feedstocks of primarily recycled and secondary materials.

Policy

The National Recycling Coalition recommends that the federal government allocate staff and resources to facilitate the transfer of information about existing and emerging recycling technologies for all commodities currently recycled from the municipal solid waste stream including, but not limited to, metal, glass, paper, plastics and yard waste. This technology information transfer should include, at a minimum:

- Standardized definitions and specifications for use and application of these materials; and
- Information on the value of these materials; e.g., the value of compost for agricultural productivity and landscaping.

Cross-reference: Education and Outreach

DESIGN FOR RECYCLING

BUILDING CONSTRUCTION CODES

Rationale

Recycling is increasingly becoming an integral component of the nation's waste management system. As the waste disposal crisis deepens, many communities have enacted or are considering the enactment of recycling programs to help offset their disposal crisis.

Residences, commercial (public and private), and institutional multi-family and multi-unit buildings pose unique obstacles in the implementation of and compliance with local recycling efforts in densely populated urban areas. These obstacles include, but are not limited to, lack of storage space, access, enforcement and education. Because most local building codes do not currently make provisions for recycling systems, these obstacles are likely to continue.

Policy

Municipal governments should direct and assist their Building Departments to develop codes and guidelines for the implementation of recycling programs that are consistent with the safety, health and well-being of building residents.

Local buildings codes should require new buildings and major renovations to explicitly provide for recycling systems as an integral component of the buildings' waste management systems. Special attention should be paid to provisions addressing office and multi-tenant buildings, especially in terms of storage and collection areas for recyclable materials.

Building codes should be developed jointly by the appropriate agencies administering local recycling programs and by all other pertinent local agencies to ensure that specific requirements of building codes are consistent with local recycling programs and maintain the highest standards of health and safety of building residents in their implementation. In addition, the national Uniform Building Code should be modified to conform with these considerations.

Cross-reference: Legislation and Regulation

COMPOSTING

COMPOSTING

Rationale

Clean, source-separated compostables, such as leaves, grass clippings, brush, food scraps, and non-recyclable paper, represent a significant portion of the municipal solid waste stream. Composting is a viable strategy for achieving the reduction of this portion of the waste stream.

Policy

The National Recycling Coalition desires to promote composting of the above stated materials and the use of compost by:

- Recognizing backyard composting as a source reduction method.
- Maximizing composting and recycling as an integral part of waste and resource management to achieve the benefits of environmental protection, resource conservation, and social and economic development.
- Including composting as a separate component within the Municipal Solid Waste management hierarchy equal in importance with recycling.
- Supporting production and procurement of composted products and mulch by all levels of the public and private sectors.
- Recommending research into new applications for composted products and mulch.
- Supporting the development of standards for compost and mulch.

Cross-reference: Waste Reduction Practices

RECYCLING ECONOMICS

ACCOUNTING FOR COST OF DISPOSAL & UTILIZATION

Rationale

In the past, consumers have purchased products or materials without regard to the costs of disposal that are paid after the products' intended use is completed. Manufacturers have not generally factored into the design or manufacturing of products the environmental liabilities or costs to consumers of disposal, resource depletion, habitat loss and ozone destruction.

Now that disposal capacity is recognized as a scarce resource, product disposal costs should be borne, at least in part, at the production level, where design decisions are made. In this way, industries will be able to fully account for the effects of their products on the environment, and design their products and reduce packaging to minimize such effects. Consumers will then be able to choose to purchase products with a full understanding of the costs of proper disposal.

This approach is already being taken within the hazardous waste arena, where source reduction and waste minimization are recognized as the most cost-effective response to the concerns raised by the need for proper disposal and by the liabilities associated with the clean-up of hazardous wastes.

In addition to the direct costs of disposal, costs for public education, product redesign incentives and disposal alternatives should be borne through product charges. In the long run, all environmental costs of a product, including its true resource costs, should be included in its price.

Including such factors in design decisions will ultimately contribute to the United States competing more efficiently in a global economy by eliminating waste of material, energy, and human resources.

Mechanisms that could assist or encourage industry in evaluating such factors, in addition to product charges, include processing fees, repeal of tax and favorable policy treatment for mining and virgin material usage, regulatory reviews regarding new products, clarifying the liability of manufacturers for environmental costs associated with use or misuse of their products, environmental labeling, certification procedures, and technical assistance/research and development assistance to assess product impacts. In addition, waste management and disposal should be priced to reflect their true environmental and economic cost.

Manufacturers have begun to respond to the interest in designing for waste reduction and recyclability, but have difficulties in assessing which alternatives would ultimately be viewed as more environmentally sound by consumers. Manufacturers would welcome clear national leadership in these areas. The appropriate mechanisms should be implemented first on a voluntary basis targeted by commodity and specific market segment.

Improvements in other major national policies could contribute dramatically to better product design choices by manufacturers.

RECYCLING ECONOMICS *(continued)*

Policy

1) The National Recycling Coalition encourage manufacturers to voluntarily evaluate the environmental liabilities or costs of their products before introducing those products to the marketplace.
2) The Recycling Advisory Council or National Recycling Coalition should identify ways in which manufacturers and/or the federal government could assess the impacts and/or liabilities of products prior to their introduction into the marketplace.
3) The National Recycling Coalition encourages the federal government to conduct an ongoing review of all federal fiscal policy, such as federal subsidy programs and rate structures, to identify the environmental impact of these policies, especially as they relate to resource utilization, and to establish appropriate changes. Such changes should include the following:
   a) Elimination of virgin fiber subsidies associated with federal timber sales which artificially lower the price of wood fiber.
   b) Modification of freight rate structures to eliminate inequities in transporting from generation sources to recycling facilities.
4) The National Recycling Coalition recommends that the EPA develop simple, standardized accounting models that allow state and local governments to accurately measure and compare the full short and long-term environmental and economic costs of different solid waste management alternatives. Eventually these models should attempt to identify these costs in such a way as to internalize existing externalities associated with the various solid waste management options.

   These models should be as straightforward as possible and could be as simple as spreadsheets that carefully delineate all costs that should be taken into account such as landfill closure, subsidies such as land donations, property tax abatements, and municipal bonds for resource recovery facilities. Furthermore, the National Recycling Coalition recommends that federal and state waste management planning provisions be modified to include a requirement that local governments using the models developed above, analyze the full costs of different solid waste management options as part of the solid waste management planning process.

Cross-reference: Legislation and Regulation

FINANCING

CONTINGENCY PLANNING FOR RECYCLING MARKETS

Rationale

The viability of local recycling programs rests heavily on the availability of markets. As larger levels of investment are made in recycling programs, there is a need to establish contingency plans to anticipate what actions should be taken if different economic conditions develop.

Policy

Local governments should be encouraged to develop contingency plans that:

- Identify materials where market demand is exceptionally weak, particularly where the loss of one market might compel the landfilling of the materials.
- Identify alternative uses for materials with weak markets, and identify any procurement policies, legislation, or economic development efforts needed to diversify markets for such materials. Priority attention should be given to markets for yard waste and all commodities of paper collected in curbside and commercial recycling programs.
- Establish trigger levels and mechanisms to direct recycled materials to other uses once the value of materials falls below established standards. Possibilities for short-term stockpiling of materials should also be fully explored on a regional basis, although limited shelf-life and market-flooding supply stockpiles might weaken a community's negotiating position.

Over the long term, the focus of contingency planning should evolve from short-term protection of recycling programs and minimization of a city's financial risk to development of new markets and new products for recyclables.

Cross-reference: Market Development

COST-EFFECTIVE RECYCLING OPERATIONS & FACILITIES

Rationale

Source-separated, recovered materials diverted from municipal solid waste (MSW) for which recycling markets exist should not be considered solid waste. Subjecting recycling operations and facilities to burdensome and unnecessary regulations and permitting requirements will prevent the timely development of recycling infrastructures.

Policy

The National Recycling Coalition recommends that recycling operations and facilities be regulated to the extent necessary to protect public health and the environment but not subjected to unnecessary regulations and permitting requirements governing solid waste.

All local, state and federal government regulations, permitting processes and interagency coordination should be streamlined to facilitate the timely establishment of collection programs, the construction and operation of new recycling facilities and the expansion of existing recycling facilities.

Cross-reference: Legislation and Regulation

FINANCING *(continued)*

ESTABLISHING ECONOMIC INCENTIVES THROUGH AVOIDED COLLECTION/ DISPOSAL COSTS

Rationale

As source reduction, recycling and composting programs are instituted, costs of garbage collection and disposal are avoided by the municipality and/or its contractor(s). One of the most challenging aspects of changing local systems to foster recycling will be establishing methods to accrue the avoided collection and disposal costs to the benefit of funding recycling programs.

Policy

Avoided collection and disposal costs should be established in a way that provides incentives for waste generators, collectors and landfill operators to expand recycling and encourage the reduction of amounts of waste generated, and that takes into account future increasing waste disposal costs.

In most instances a multi-faceted program will be required over several years' time to change contract and ordinance language and the design of the solid waste system to a point where the price signals are provided to all involved to foster source reduction, recycling, and composting.

Cross-reference: Recycling Economics; Legislation and Promotion

ESTABLISHING ACCESS TO INVESTMENT TOOLS FOR RECYCLING PROJECTS

Rationale

Waste reduction recycling are capable of handling substantial portions of the solid waste stream and in many cases reducing overall public and private expenditures on solid waste management. Innovative, large-scale recycling programs will require full funding to achieve their maximum potential. To expand their operations, private firms that use recovered materials require assurance that recycling collection programs can reliably supply large quantities of materials at consistently high levels of quality.

Improved financial mechanisms for recycling, such as contractually guaranteed delivery of materials and tipping fees to intermediate materials processing plants, can leverage greater private revenue bond financing. Source reduction often has substantial benefits in product purchase and use patterns that occur outside the waste disposal system and are rarely counted as part of the benefits of source reduction programs.

Fiscal policies for solid waste management that discriminate against reduction and recycling distort the role of market forces in determining the mix of waste management options and participants within an integrated solid waste management framework and, in practice, undermine the intent of the solid waste management hierarchy.

Policy

Public solid waste management investment decisions must incorporate full and fair comparisons of the economic and environmental costs of all solid waste reduction, recycling, management and disposal options including benefits that occur during waste production.

FINANCING *(continued)*

ESTABLISHING ACCESS TO INVESTMENT TOOLS FOR RECYCLING PROJECTS (CONTINUED)

Appropriate fiscal policies and funding mechanisms must be developed so that, at the very least, they provide waste reduction and recycling with financial opportunities consistent with those available to other waste management options. Federal financial assistance should be provided to local government (i.e., seed money supplemented by a state match for low-interest loans or similar arrangements), focusing on regional recycling and yard waste composting programs, local market development programs and source reduction programs.

Federal and state tax codes should be revised to make tax-exempt financing available for funding the development of public and private sector recycling.

The National Recycling Coalition recommends that before issuing Requests for Proposals (RFPs) for specific waste management services, local governments should have in place a comprehensive plan for managing all elements of the solid waste stream. Federal and state governments should require that these plans contain appropriate recycling and waste reduction implementation strategies reflecting national and state waste management hierarchies and local environmental and market considerations. To the extent feasible, these RFPs should be drafted to encourage competition and innovation for recycling services.

Local governments should offer the same financing mechanisms, and risk protection measures for different waste management and recycling services.

The National Recycling Coalition recommends that in generating revenue for recycling systems, emphasis be placed on specifically dedicated and secure revenue sources.

In making these recommendations, the National Recycling Coalition acknowledges local governments' need for technical assistance to implement these recommendations and the critical need for measures to stimulate market demand for the recyclable materials collected by local government recycling programs.

Cross-reference: Recycling Economics

FISCAL POLICIES FOR PUBLIC SECTOR SOLID WASTE INVESTMENTS

Rationale

A substantial combination of public and private investments will be required over the next decade to expand the necessary recycling infrastructure to meet goals already established and those being proposed nationally.

Policy

Federal, state and local programs for economic development, community development, redevelopment, research and development and pollution control assistance should clearly authorize expenditures for source reduction, recycling and composting collection, processing and market development activities to be eligible for participation in public investment tools.

Private investors, venture capitalists and alternative investment houses should all be educated about the demand for these investments and the prospects for their participation in the

future. Federal and state programs should be developed to encourage the maximum investment by the private sector, particularly in commercially available technologies.

Federal and state programs should also be developed to encourage the maximum innovation and research and development into new technologies by both the public and private sectors, including at universities and colleges throughout the country. Primary emphasis should be on policies and investments that expand the demand for recycled products, to provide the most efficient sources of supplies for the nation's manufacturing industries.

Cross-reference: Market Development; Procurement

LOCAL FUNDING AUTHORITY FOR INTEGRATED WASTE MANAGEMENT

Rationale

Many of the local funding methods used by local and state governments to further government projects would be useful to support integrated solid waste management projects.

Policy

Local governments should be authorized by state governments to enact a broad range of local fees and taxes to support all aspects of an integrated waste management program (including market development activities), and to set rates for waste collection and disposal. Integrated waste management fees and taxes should be authorized to be levied on waste generators, waste collectors, waste and recycling processors, transfer stations, waste-to-energy facilities and landfills.

State enabling authority should require such fees and taxes to be dedicated to the specific purposes of program implementation on a cost recovery basis, and should encourage the establishment of "enterprise funds" by local governments to accurately account for these funds (and to decrease the burden on city and county general funds). In cities or counties that have charter restrictions requiring garbage collection costs to be paid out of the general fund through general taxes, integrated waste management fees and/or taxes should be additionally authorized to supplement basic garbage collection services.

Eligible activities to be funded by such fees and taxes should include staffing, consultants, analyses and all direct and indirect costs including the actual capital costs and operating expenses for integrated waste management programs. Market development activities should include any incremental costs for purchase of recycled products previously not budgeted, economic incentives for the expansion of existing recycling product manufacturing operations, and the attraction of new recycling product manufacturers (including assistance in permitting, financing, site acquisition and pollution control costs).

Fees and taxes should be authorized to be raised by individual cities or counties or jointly by several cities and/or counties working together. In the event that a regional framework is developed, revenues should be authorized to be shared for any authorized integrated waste management purposes pursued individually or jointly.

Cross-reference: Market Development; Procurement

FINANCING *(continued)*

LOCAL RATE SETTING/ STRUCTURES TO SUPPORT RECYCLING

Rationale

The methods used to establish the rates or fees for source reduction, recycling and composting services can affect participation rates, overall cost effectiveness, public support, and efficiency in project administration. They must, therefore, be established with an eye toward their impact on these concerns.

Policy

The costs of local source reduction, recycling and composting programs should be included as part of the costs of the overall solid waste system. Recycling programs should not be required to be shown separately on bills unless all other components of the solid waste system are itemized (e.g., collection costs, transfer costs, landfill costs, regulatory costs, fees and taxes).

Costs to provide source reduction, recycling and composting services to both residential and commercial customers should be identified to decision-makers at the same time rates are set for each sector. Incentives should be included in the rate structure to encourage source reduction, recycling and composting in both residential and commercial rate structures.

Franchise fees for the privilege of doing business in an area should be able to be adjusted during the life of collection contracts to provide an additional source of revenue for local governments to implement programs. These could be evaluated annually as part of the rate-setting and budget development process.

Separately addressing contractor payments, franchise fees, and additional integrated waste management fees or taxes should provide local governments with significant funding authority to maximize their options to fund source reduction, recycling and composting activities. This could be facilitated by clear contractual authority for local governments to direct their contractors to bill residents and businesses at a total service rate that local governments specify (adjusted annually).

MARKET DEVELOPMENT

BUILDING A RECYCLED MATERIALS MANUFACTURING BASE

Rationale

Recycled paper and scrap metals are the two largest export commodities on the West Coast. Although such export markets have helped to ensure the economic viability of West Coast recycling programs when others in the nation have struggled to find markets, it is also a sign of weakness. Like many Third World economies, the United States is not value-adding. We are becoming a supplier of basic raw materials (from recycling) which other economies are processing into much higher-value materials and products, often for consumption back in the U.S. To build a recycling manufacturing base will not only strengthen the demand for recycled materials, but it will also assist in resolving our nation's balance of trade deficits, and will reinvest local waste resources that contribute jobs and taxes to local economies.

Policy

Expansion of existing recycling mills and attraction of new environmentally sound manufacturing plants should be a high priority for local, state and federal governments. A concerted effort is needed to coalesce both public and private interests in recycling into a national commitment to enable the United States to be more competitive in the world economy.

Financing tools such as state and local bond issues should be structured creatively to foster such market development activities, to provide the seed money or economic margin to warrant significant investment by the private sector in recycled materials manufacturing in the U.S. Innovation by start-up businesses should also be encouraged to to develop solutions to major problems in this field. Such an entrepreneurial emphasis will also enable the U.S. to offer new recycling services to other countries once they are developed here.

Cross-reference: Financing

INCREASING DEMAND FOR RECYCLED PRODUCTS

Rationale

Unless the cycle is altered to shift direction from past reliance on virgin materials, even the expansion of recycling manufacturers in this country will only displace demand from current recycling manufacturing activities in other countries.

Policy

Greater attention must be given to developing demand for recycled products by industry and general consumers. The advertising and printing industry must be challenged to rethink the standards that are set for many products, to allow for greater use of recycled materials and products. Transportation and construction companies must be challenged to adjust their specifications for materials used in construction and landscaping to specify the highest use of recycled materials, rather than discouraging them. Labeling of products as recycled will also enable the public to identify these products to prefer for their purchasing.

Local governments should develop and advocate state legislation requiring manufacturers to use products with the maximum technically feasible levels of post-consumer recycled content (e.g., in newspapers, office papers, printing and copy papers, and glass).

Cross-reference: Procurement; Product Labeling

MARKET DEVELOPMENT *(continued)*

MARKETING COOPERATIVES

Rationale

Marketing cooperatives would establish formal or informal trigger prices at which materials would be voluntarily withheld from or released for sale to markets. Such cooperatives would all respond to the need for the United States to more aggressively compete as a unified whole in international markets, where other countries have already established major public/private partnerships that dramatically affect the process of marketing recycled materials sold from the United States.

Policy

The National Recycling Coalition favors the establishment of marketing cooperatives among interested cities and companies.

RECOMMENDED MARKET DEVELOPMENT INSTRUMENTS & ACTIVITIES

Rationale

The success of recycling depends on the manufacture of recovered materials into useful products that reenter the economy. Recycling is only successful, economically and environmentally, to the extent that it replaces rather than augments the use of some virgin resources.

Rapidly increasing collection of recyclable materials to avoid high disposal costs poses potential opportunities of great magnitude for recycling, including the creation of new jobs and economically competitive industries. Solid waste managers and industries that use secondary materials hold common interests in maintaining market reliability, high quality standards for recovered materials, and regional cooperation among public and private market development entities.

A major goal of market development is to close the gap between the supply of and demand for recyclables. Source reducing the supply of recyclables is a viable and desirable market development mechanism to be pursued in addition to, not instead of, other techniques. Source reduction may be cheaper and faster to implement than traditional market development options.

Policy

Market development programs must be made an integral part of recycling collection initiatives. In promoting markets for recovered materials, economic development, waste management and environmental protection authorities must work with private firms to select, fully fund and implement the most appropriate and cost-effective market development instruments and activities from among the following available policies:

Material processing facilities.

Contracts between suppliers and manufacturers.

Economic development programs (including financial assistance and technical assistance with facility siting and permit review).

Regional cooperative brokerage and transportation management programs.

Preferential procurement of recycled products.

MARKET DEVELOPMENT *(continued)*

Information and research programs (such as information clearinghouses and public, private and university R&D consortia) to develop new recycled products and expand the use of recovered materials in existing products.

Investments in transportation infrastructure and marketing programs to facilitate increased use of recovered materials domestically and overseas.

Reassessment of standards and specifications for products and secondary materials, and education programs for consumers and businesses to expand demand for recycled products.

Revisions in the tax codes, including differential packaging or materials taxed that favor recycled materials.

Additional market development instruments as required by innovation and change within the recycling industry.

The National Recycling Coalition encourages the federal government to support markets for all major recyclable materials, especially paper, plastic and glass products, through the following activities:

- Making federal funds available for educational and research programs that stimulate the collection, recovery and reclamation of recyclable materials, but do not duplicate ongoing private sector efforts.
- Supporting alternative uses (e.g., compost, building materials) of recovered commodities that cannot be economically or environmentally recycled back into a primary or secondary recycling application.
- Encouraging manufacturing processes and products that reduce or eliminate the levels of contaminants that interfere with the recycling process.
- Disseminating technical information on methods to handle new contaminants to collectors, processors and reclaimers.
- Supporting all levels of government in the establishment of collection programs that effectively separate these recyclables from refuse.
- Establishing and implementing procurement guidelines for recycled content products used in federal government transportation and construction projects.

All local, state and federal government regulations, permitting processes and interagency coordination should be streamlined to facilitate the construction and operation of recycling facilities.

Cross-reference: Legislation and Regulation; Procurement; Education and Outreach

EDUCATION AND OUTREACH

ESTABLISHMENT OF ANNUAL RECYCLE WEEK

Rationale
An annual "Recycle Week" is an effective educational component of a strong recycling educational policy.

Policy
The National Recycling Coalition supports the national enactment of an annual "Recycle Week" as a means to remind and educate the population about the benefits of recycling.

ESTABLISHMENT OF COLLEGE & UNIVERSITY CURRICULUM

Rationale
A national education policy is needed that emphasizes environmental quality, resource conservation, source reduction, recycling and sustainable growth, so that society can enjoy the best of science and technology and live in harmony with nature.

Solid waste management suffers from a lack of qualified personnel to carry out the broad mandates of waste reduction and recycling. In business and industry, professionals are needed to maximize product durability, to ensure accommodations for recycling in building design, and to promote procurement of recycled and low-waste materials. In government, professionals are needed to implement needed programs in source reduction, recycling, procurement and market development ,and in shifting the solid waste system to an integrated waste management system.

Policy
Colleges and universities should develop fully-accredited degree programs for integrated waste management and recycling to train future graduates to become waste management professionals with expertise in these particular fields. Degree programs may include single-disciplinary degrees with a solid waste/recycling emphasis (e.g., engineering and packaging design or architecture and building design for recycling) as well as interdisciplinary programs involving business, political, economic legal, environmental and engineering perspectives.

To raise environmental consciousness and as part of general education in community colleges, colleges, and universities, courses should be required in Biology of Human Survival, including emphasis on cycles in nature and essentials of environmental ethics, resource management, source reduction and recycling.

Colleges and universities should aggressively work to develop graduate programs to research and develop innovative products from recycled materials, and to provide quantitative and qualitative information to professionals in the field as part of a nationwide recycling extension service. Colleges and universities should be encouraged to provide the maximum number of recycling opportunities for all materials on campus, to act as a model and to provide experience for volunteer and paid students to learn about recycling from an operations perspective.

EDUCATION AND OUTREACH *(continued)*

ESTABLISHMENT OF K-12 RECYCLING CURRICULUM

Rationale

Source reduction and recycling are not currently represented in the format framework of environmental education in K-12 schools.

Policy

The source reduction and recycling of waste must be reflected in K-12 school curriculum for society to make this a daily practice. A clearinghouse to provide technical support may be useful. Consistent, coordinated statewide programs are need to provide information on and involvement in source reduction and recycling programs at all stages of K-12 curriculum.

Current science curricula would be the first place include a significant emphasis on these topics. Initial efforts should be made to incorporate these topics into at least four specific grade levels in the K-12 public school system. The goal should be to constantly and consistently strive to instill reduce-recycle values over time.

High schools should be encouraged to provide the maximum number of recycling opportunities for all materials on campus, to act as a model and to provide experience for volunteer and paid students to learn about recycling from an operations perspective.

NATIONAL RECYCLING COALITION ROLE IN RECYCLING EDUCATION & OUTREACH

Rationale

Education and outreach are required for change that results in rational decisions to increase waste reduction and recycling. Education and outreach information should be easily accessible to private and public sectors, the media, and the general public.

Policy

The National Recycling Coalition, long committed and mission-driven to be the primary source of balanced information on waste reduction and recycling, should be broadly supported in outreach and educational efforts. The National Recycling Coalition should maintain current sources of credible, pertinent information generated from both outside and within the organization. The information should be regularly compiled, then provided through a variety of means including:

- Technical reports
- Directories and reference materials
- Newsletters
- Computer and electronic mail networks
- Displays at conferences and meetings
- Presentations by Coalition Board members
- Roundtables, networking sessions, committee and task force meetings

Existing information and dissemination methods should be periodically reviewed to determine their effectiveness and adjusted accordingly to meet the goals and objectives of the National Recycling Coalition and the needs of those outside the organization.

EDUCATION AND OUTREACH *(continued)*

NATIONAL CLEARINGHOUSE FOR RECYCLING INFORMATION

Rationale

Source reduction, recycling and composting programs are under development and expansion throughout the country. Local agencies and businesses have information needs which should be addressed through a coordinated source. By making important information readily available, the federal government can encourage these activities.

Policy

A National Clearinghouse should be established along with a recycling extension service for recycling information, sponsored by the EPA, with the following functions:

- Maintain an up-to-date file on all significant state legislative proposals and local ordinances that seek to reduce waste or promote recycling.
- Report rapidly on the development of new collection and processing technologies, and marketing techniques as they are implemented around the nation.
- Report recycling rates for all commodities commonly collected through buy-back, drop-off, curbside recycling, commercial/industrial recycling or composting activities in a format that can be disaggregated to the level of source of the data by city.
- Report on the costs of recycling (including energy and resources saved), and the costs of collecting and disposing of garbage, including avoided collection, landfill and depletion costs resulting from recycling.
- Provide information to the public through a variety of means, including a toll-free hotline, publication, computer network, public service announcements and/or videos, and a recycling extension service in conjunction with state recycling associations and universities throughout the nation.
- Identify universal measures and methods of calculating to establish level of performance and success of programs.

Similar statewide and local clearinghouses should be established.

PUBLIC INVOLVEMENT IN PROMOTING RECYCLING

Rationale

The public's cooperation and participation is critical to the success of recycling.

Policy

Promotions of recycling should be more coordinated, comprehensive and consistent in approach, with an emphasis on "Buy Recycled" at the state level. The public should also be sought more to participate in long-term solid waste management and planning

PRODUCT LABELING

PRODUCT LABELING FOR RECYCLABILITY/ RECYCLED CONTENT

Rationale

Recyclable products and packaging greatly facilitate environmentally sound solid waste management. The success of recycling programs depends on labeling of products and packaging for their recycled material content and their recyclability, and on consumer demand for products and packaging made from recycled materials.

Consumers and product manufacturers need reliable information regarding the recycled content, reusability and recyclability of products and packaging. Misuse of recycling symbols and terms is increasing, and it is difficult to interpret the claims of environmental labels created by manufacturers. A neutral, independent, official certification is needed to provide the reliable information.

Policy

The National Recycling Coalition:

Recommends adoption of "green labeling" programs for application to a broad array of products and packages. The Green Seal and Green Cross campaigns and other campaigns being developed by environmental and business groups should indicate products and packages that minimize waste, are reusable or have post-consumer recycled content.

Supports adoption of federal legislation or regulation setting nationally uniform requirements and standards to regulate the environmental marketing practices and the environmental labeling of products and packaging for recyclability, reusability and recycled content. Further recommendations for development of federal legislation or regulation are as follows:

The recycling component of a national environmental labeling and marketing regulatory program should be based on a mandatory truth-in-advertising approach and uniform criteria which require the disclosure of certain information, based on federal standards, when making claims of recycled content or recyclability.

The Federal Trade Commission should increase its case by case enforcement of misleading, deceptive or unsubstantiated environmental marketing and labeling claims.

Congress, the Federal Trade Commission, the EPA, the U.S. Office of Consumer Affairs, state attorneys general, industry, academe and other critical parties should work together with the goal of developing simple and specific environmental labeling and marketing guidelines. These guidelines should be used as the basis for any mandatory programs established by Congress or other relevant federal or state agencies.

The Council of State Governments Northeast Recycling Council (NERC) labeling standards should be used as a model by the federal government in the development of national standards.

PRODUCT LABELING *(continued)*

A national standard should establish uniform labeling guidelines for products and packaging for reusability, recyclability and recycled content. It should also establish definitions for biodegradable, photo-degradable, compostable, source reduced and toxicity reduced. Minimum standards should be established and adopted by the federal government for environmental marketing claims.

- Supports inclusion of instructions on environmentally appropriate uses and methods of use of the product being purchased and its package.
- Supports, at the state and federal level, the use of the three-arrow recycling logo for the labeling of products and packaging to indicate recyclability, reusability and recycled content.
- Recommends labeling of products that may only be disposed of as hazardous wastes and provision of a means of disposal that does not exceed the purchase price of the product. All products certified to require disposal as hazardous wastes should be identified on store shelves with a particular symbol, to caution consumers of the difficulties of proper disposal.

The National Recycling Coalition recommends a program that will include the following:

- Recommended standards for recycled content prepared by National Recycling Coalition or the Recycling Advisory Council (RAC) which are consistent with existing procurement standards.
- Recommended criteria for labeling that include waste reduction, recycled content, reusability, and recyclability.
- Recommended standards for the above that are prepared by National Recycling Coalition or an appropriate agency and viewed in light of other regional efforts.
- Criteria for recyclability that attempts to be consistent with local recycling programs.
- Use of an independent laboratory to conduct testing and certification.
- Development of a national education program to inform consumers and producers of the benefit and use of these labels.
- Voluntary use of labeling; however, an enforcement mechanism should be established, on the national level, to prevent improper use of the label.

Cross-reference: Legislation and Regulation; Design for Recycling

LEGISLATION AND REGULATION

DEGRADABLE PLASTICS USE

Rationale

Some plastic recyclers have identified technical problems associated with processing, marketing and remanufacture of secondary plastics into which degradable plastics have been introduced. Aware of the technical uncertainties about the introduction of degradable plastics into their recycling systems, plastics recyclers in general have limited or discontinued the purchase of certain secondary plastics streams because those streams may contain degradable plastics.

Degradable plastic products are being marketed as environmentally beneficial products that will reduce solid waste problems associated with the disposal of plastics. However, many of the claims about degradable plastics concerning their rate of degradation, recyclability, and environmental impact have yet to be substantially verified through in-depth and rigorous research, and debate continues as to the validity of such claims.

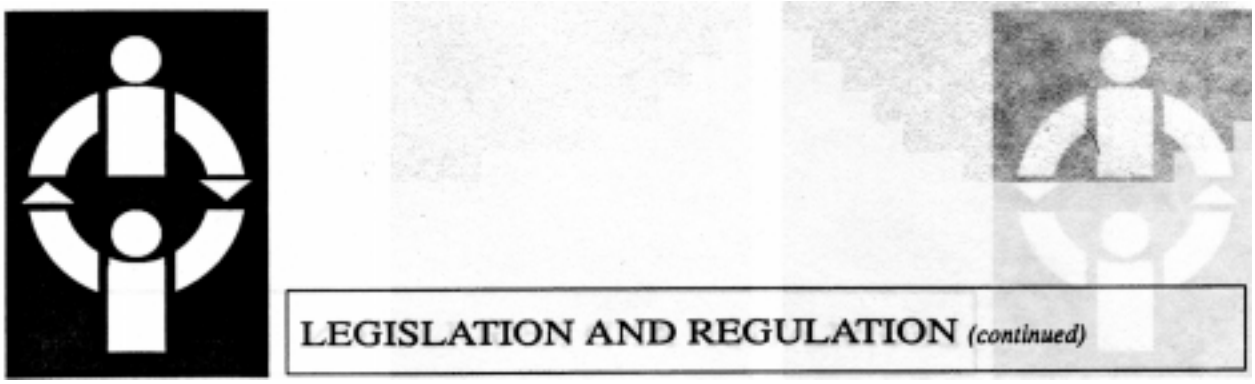
In a few special cases, recycling of a plastic product is unlikely and degradability does provide significant benefits; for example, six-pack rings. However, governments at all levels have introduced or are proposing the introduction of legislation that would require the use of degradable plastics in the manufacture of certain consumer products, despite the lack of scientific evidence in their favor.

Policy

The National Recycling Coalition opposes the proliferation of degradable plastics, until substantial evidence is presented to demonstrate that these materials will not have a deleterious effect on plastics recycling and will have a positive impact on solid waste disposal systems. The National Recycling Coalition calls for an immediate moratorium on the introduction and passage of legislation at any level of government that would require or support the use of degradable plastics until issues of controversy have been resolved except in special cases
noted above.

The National Recycling Coalition supports continued research into the viability of degradable plastics prior to their introduction into the marketplace, and that no such entrance shall take place without a full review of their environmental impacts. The National Recycling Coalition urges the federal government to establish testing standards to verify the safety and performance of these products.

Cross-reference: Design for Recycling



LEGISLATION AND REGULATION *(continued)*

COST-EFFECTIVE RECYCLING INFRASTRUCTURE

Rationale

As cities and businesses look to expand and strengthen their recycling efforts, the roles of the existing network of recycling collectors, processors and markets is affected. These impacts need to be considered by program planners and policy makers.

Policy

As recycling activities are expanded, efforts should be pursued in a way that builds upon the existing recycling infrastructure of markets, processors, collectors, sorters (both private and non-profit) and the throughput they generate. As the existing infrastructure grows, steps should be taken to ensure cost-effective design of systems, and for collection, processing and end-uses to grow in size together.

Incentives to increase the recycling rates should be structured to provide maximum benefit to those who increase the amount of recycling in an area, rather than support existing activities. Community-based recyclers and non-profit recyclers should be funded and encouraged to expand into other recycling activities (such as commercial recycling pickups and public education) once public and private recycling activities are provided. Alternatively, other activities could be incorporated into the design of services to be provided on a more comprehensive basis.

LANDFILL TIPPING FEES

Rationale

Landfill tipping fees often do not reflect to the true cost of disposal. As a result materials that would be better handled through source reduction, recycling or composting continue to be landfilled, even when these alternatives are more cost effective, because the proper economic incentives are not in place.

Policy

Local prices at landfills should be set at replacement costs or higher to encourage source reduction, recycling and composting, and to encourage waste generators and haulers to keep recyclable materials separate from other wastes. Incentives or lower fees for "clean" loads (those that can be easily separated for post-source recycling, as in a load of wastepaper from business offices only) will enable landfill operators to produce higher quality recycled materials, and provide benefits to waste generators to encourage their participation in such programs.

Expenses for public education, research and development, and regulatory costs should be factored into the basic rates of disposal. Local solid waste plans should foster such rate restructuring.

Cross-reference: Recycling Economics

LEGISLATION AND REGULATION *(continued)*

OPPORTUNITY TO RECYCLE LEGISLATION

Rationale

Continued emphasis on recycling of post-consumer materials—not only in residential waste, but also in waste generated from commercial and industry sources —is required as a significant part of prudent and environmentally sound solid waste management. To increase the diversion rate of such materials from the municipal solid waste stream throughout the nation will require opportunities for all citizens, businesses and industries to recycle and adequate markets to use the collected materials. The opportunity to recycle can be provided by private, public and non-profit organizations or partnerships.

In addition, setting goals at the state level for landfill diversion rates ensures that materials are collected and recovered for recycling.

Policy

To foster increased recycling of all materials from all municipal solid waste sources and to stimulate development of necessary recycling infrastructure, the National Recycling Coalition advocates the enactment of legislation by the various states which requires municipalities to provide an opportunity to recycle, establishes landfill goals of 25 percent by the year 1995 and 50 percent by the year 2000, and also provides for strong market development through procurement of products containing recycled materials and fostering local public and private utilization of collected materials.

Cross-reference: Procurement

RECYCLED CONTENT PRODUCT STANDARDS

Rationale

Improvements in the markets for recycled materials will add certainty to recyclable material collection programs expanding throughout the nation. The expansion of markets, in turn, rests heavily on the use of recycled content products. Thus, measures are needed to expand and encourage the use of recycled content products.

Policy

Local, state, and national laws should be adopted that ensure the highest level of recycled content available in the marketplace for newspapers, packaging and other consumer products. Wherever possible, standards should be revised to allow greater use of recycled and recyclable materials. Impediments to use of recycled products should be scrutinized carefully, including review of FDA health-related constraints on recycled materials used in a variety of food packaging and paper brightness standards.

The impact of hazardous wastes regulation on recycling programs should be evaluated carefully to assure the maximum benefit to society is achieved in reducing both solid and hazardous wastes (e.g., non-bleachable inks have been introduced to decrease the amount of hazardous wastes from inks, but make paper non-recyclable in today's technology). The National Recycling Coalition also urges that all public and private bodies with responsibility for establishing product standards consider as factors in the standard development the product's useful life and the use of waste materials in the manufacture of new products.

RCRA REAUTHORIZATION

Rationale

Reauthorization of the Resource Conservation and Recovery Act provides an appropriate opportunity for federal decision makers to create, support and enable a variety of important measures to encourage waste prevention, recycling, composting and material utilization.

Policy

The National Recycling Coalition encourages Congress to reauthorize the Resource Conservation and Recovery Act as soon as possible. To address these critical concepts, RCRA reauthorization should:

1) Place a strong emphasis on market development for recyclable commodities. Efforts that address end use markets for plastic, glass and paper are critically important. Action to develop markets is needed at the federal level.
2) Place a high priority on the immediate development of national guidelines and standards for recycled content, refill/reuse rates and source reduction standards. Such standards should be established by commodity (glass, paper, metal, plastic, etc.), application (paper grades, container types, etc.) and activity (eating, housing, transportation, clothing, health care, information, etc.). Specific utilization rates should be established and pegged to target years. In establishing these guidelines and standards, the feasibility of the following material utilization rates (percent of material generated that is reused/refilled, source reduced, recycled) should be established by 1993:

    - Glass, metal, plastic and wood packaging should meet a 25% utilization rate by 1995 and a 50% utilization rate by the year 2000.

      Paper packaging, newsprint and printing and writing paper should meet a 40% utilization rate by 1995 and a 65% utilization rate by the year 2000.

      Aggregate municipal solid waste production should be reduced by 20% by the year 2000, with waste production of industry materials (i.e., excluding yard debris) reduced by at least 10% by 2000.

      The feasibility of meeting the targeted utilization rates by the specified years should also be evaluated to ensure they are both practical and achievable. Rates that may be recommended by the RAC and other environmental, governmental, academic and industry groups representing each major recycling commodity should also be evaluated in selecting the utilization rates for target years.

3) Allow industry to meet these standards voluntarily unless the end markets are not available to meet the diversion targets, as described under item 6 below.
4) Include recycled content requirements (designed to achieve the utilization rates established under item 2 above) for applications (paper grades, container types, etc.). These requirements would be triggered where industry does not meet the guidelines and standards voluntarily.
5) Include a program element that establishes, enforces and measures national recycling rates, waste production rates and destructive disposal rates.

LEGISLATION AND REGULATION *(continued)*

6) Establish a national recycling goal consisting, at minimum, of a 25% average recycling rate of materials currently disposed in the municipal solid waste stream by 1995 and 50% by the year 2000.
7) Establish a national recycling goal consisting of higher recycling rates as long as they are supported with the establishment of adequate financial and market development measures to assist local governments in implementing them. The following recycling rates could be supported under this circumstance: 40% of all metals, glass and paper, and 25% of all plastics.
8) Establish a national ban on yard waste being disposed of in landfills by the year 2000.
9) Ban from combustion and municipal solid waste composting facilities all household hazardous waste and all recyclable and compostable materials for which there is a market.
10) Recognizing that recycling rates do not address waste production, establish a national goal of reducing waste production by 20% by the year 2000, with industrial materials reduced by at least 10% by the year 2000 (all from 1990 rates and per capita). As a corollary, solid waste disposal rates would be reduced by at least 18% by the year 1995 and by at least 42% by the year 2000 (assuming a 1990 recycling rate of about 14%).
11) Provide technical and financial support to local and state governments in establishing an infrastructure for source reduction, recycling and composting systems capable of meeting the national goals outlined above.
12) Support local government establishment of scrap tire, battery, and household hazardous waste management programs designed with a goal of maximum material recovery.
13) Expand the list of materials for which the EPA must develop procurement guidelines for purchase of products with recycled content, with a specific schedule of dates for completion. The additional guidelines at a minimum should include glass, ferrous and nonferrous metals, and plastic. Product standards for compost made from source-separated organic materials and compost made from mixed municipal solid waste should also be developed. Guidelines should specifically set minimum content standards for these materials.
14) Require that all federal paper purchases meet established recycled content guidelines (as per item 2 above).
15) Further establish a minimum of a 10% price preference in federal government procurement policy for purchase of items containing recovered materials and meeting all applicable recycled content guidelines. Further establish that federal agencies give preference to items with the greatest practicable amount of recycled content. Favor should be given to products that use post-consumer recycled content.
16) Establish terms and conditions under which manufacturers and other advertisers may make environmental claims that are consistent with the National Recycling Coalition's Product Labeling policy.

Cross-reference: Waste Reduction Standards; Market Development; Procurement; Design for Recycling; Product Labeling

LEGISLATION AND REGULATION *(continued)*

SUPPORT OF BASEL CONVENTION

Rationale

The U.S. Senate has yet to ratify the Basel Convention which is important to ensure that actions by the other ratifying nations do not interfere with the international commodities trade in separated and processed recyclables where those exports do not constitute an environmental hazard.

Policy

The National Recycling Coalition encourages the U.S. Senate to move quickly to ratify the Basel Convention.

VOLUME-BASED REFUSE COLLECTION FEES

Rationale

Many cities offer unlimited garbage collection service for a flat fee. Once recycling services are offered so that residents can choose to waste or to recycle, a limit to the amount of waste accepted at a base price should have a significant impact on consumer behavior. This base price for garbage service is analogous to the "lifeline" services provided by utilities to provide basic service while promoting conservation.

Changes in rate structure may need to be phased in gradually to diminish illegal dumping and enable generators to efficiently reduce waste. Variable can rates could also influence consumer behavior, by charging ratepayers fees which are directly proportional to the number of cans or bags they are authorized to set out.

Policy

Limited or variable can rates should be considered a critical first step toward a rate structure that discourages waste. Variable can rate structures should ideally rise steeply so that the rate for pickup of second and third cans is more that 2-3 times the rate for the first can.

Cross-reference: Financing

PROCUREMENT

PROCUREMENT POLICIES IN FEDERAL GOVERNMENT AGENCIES

Rationale

EPA has not implemented the procurement requirements in the original 1976 Resource Conservation and Recovery Act (RCRA), nor subsequent amendments. Although some guidelines have been issued in the last year, their deficient requirements will have minimal effect on stimulating greater levels of recycling. The National Recycling Coalition has sued EPA for noncompliance with the spirit and intent of RCRA, as well as specific details that would make a significant difference in the effect of EPA guidelines.

Policy

Federal, state, and local governments should immediately institute recycled products procurement standards that specify minimum post-consumer recycled content and appropriate price preferences for a broad range of products. State recycling associations, local and state governments and interested businesses should join with the National Recycling Coalition in legal actions to ensure that the Congressional intent of increasing the demand for recyclables is met.

Local and state governments should review federal and state procurement requirements (e.g., those in RCRA) to determine what additional efforts, if any, are required of them to comply with laws requiring the use of recycled materials and products when using federal and state funding for projects within that government.

Cross-reference: Legislation and Regulation (RCRA Authorization)

PROCUREMENT POLICIES IN STATE & LOCAL GOVERNMENT

Rationale

Many source reduction measures can save money or provide greater service to government. In addition, source reduction can serve to make government more efficient as it reduces environmental damage and costs. Recycled product procurement is a viable form of source reduction.

Recycled products are generally competitive with virgin products in price and quality. These products are becoming more available as more manufacturers and vendors enter the marketplace and as the supply of secondary materials increases dramatically. The availability of markets for recycled products is essential to the success of recycling and is a key element of any comprehensive approach to solid waste management and resource and energy conservation.

By working together, states and local governments can increase the use of recycled products. State and local government purchasing represents a significant percentage of the Gross National Product (GNP) and therefore can have a significant effect on the demand for secondary materials by purchasing and using recycled products. State and local agencies can influence private purchase of recycled products by setting an example through their purchases, testing products, and establishing standards and specifications that can be replicated by private agencies.

PROCUREMENT *(continued)*

PROCUREMENT POLICIES IN STATE & LOCAL GOVERNMENT (CONTINUED)

Recycled product procurement policies already exist in many places. States and local governments representing over 88% of the U.S. population have established laws favoring purchases of recycled products. In addition, the federal government, whose purchases represent 7% to 8% of the GNP, is implementing Section 6002 of the Resource Conservation and Recovery Act, which requires agencies using federal funds to favor recycled products.

Policy

The National Recycling Coalition recommends that public and private agencies and organizations establish programs to favor purchases of recycled products and engage in source reduction including:

Legislative, executive and administrative commitment to buying recycled products.

Using standard specifications, definitions and minimum content standards (such as those established by EPA under RCRA or the Northeast Regional Council) to allow manufacturers to make a standard product and reduce unit costs.

Eliminating prohibitions or limitations against recycled products and including recovered material content in bid specifications.

Requiring the highest percentage recycled content determined to be technical feasible and available in the marketplace in all purchasing specifications.

Identifying other government purchases that could use reusable/recycled materials.

Requiring purchasing agents to attend workshops conducted with trade associations to educate them on the options and opportunities for recycled materials and products.

Encouraging cooperative purchasing programs among states, local governments, regional authorities and private organizations to increase the volume of purchases and decrease unit costs.

Providing incentives, as needed, for buying recycled products, including price preferences and life-cycle costing. Private and public sector purchasing programs should be established which give preference to recycled products including a 10 percent price preference for recycled products.

Establishing annual goals for the purchase by federal agencies of products having recycled content. The goals should increase incrementally over time.

Establishing annually increasing goals for reducing product consumption by federal agencies, indexed to appropriate measures of their activity.

Eliminating or reducing the $10,000 minimum purchase requirement that now applies to government purchase of each specific commodity.

Requiring government contractors to include specifications for products having recycled content when bidding on any contracts over $1 million, as well as to use recycled products and materials in performance of the contract. Also requiring these contractors to self-certify that they have used recycled material.

Requiring the Defense Logistics Agency to review its procurement and product specifications for the Department of Defense and eliminating those that unfairly discriminate against the use of recycled products.

PROCUREMENT *(continued)*

- Strengthening reporting requirements to assure that all government procuring agencies report total annual recycled product purchasing.
- Engaging in practices or purchasing patterns that result in source reduction, such as procurement of reused, reusable, durable and repairable products.
- Fostering cooperation between vendors and users to ensure that vendors can sell recycled products and users are aware of recycled products on the market.
- Keeping good records on the recycled purchasing program to publicize the efforts and share information with other users.
- Purchasing a variety of recycled products, including products for which EPA guidelines have been established (paper, oil, tires, building insulation, concrete); products including materials being collected for recycling; products from the Official Recycled Products Guide; and other products, including but not limited to, plastic, auto parts, compost aggregate, asphalt, solvents, rubber and construction materials.

Cross-reference: Legislation and Regulation; Market Development

PROCUREMENT GUIDELINES FOR RECYCLED PAPER

Rationale

The National Recycling Coalition maintains its support for the "total recycled fiber" portion of the RAC's Definitions and Standards for Government Procurement Guidelines for Recycled Paper. There remains a strong division of Board sentiment between:

a) A requirement for specifically post-consumer content, and
b) Agreement with the RAC's recommendation for post-consumer (or comparable) category.

The National Recycling Coalition Board has an outstanding request to the RAC to respond to several key questions. These questions were raised prior to the adoption of the guidelines and have yet to be fully addressed.

1) More information is required to determine the extent of the "equivalent" component of the material that would be included in the "post-consumer or equivalent" definition by paper category.
2) More information is required on the cost of accounting for strictly "post-consumer" definition and associated economics as it affects the cost of recycling paper.
3) A procedure needs to be defined that will be utilized to account for and monitor compliance with these definitions (post-consumer or equivalent).
4) The workability of a standard that would limit the amount of "equivalent" material included in the "post-consumer or equivalent" definition would be given further consideration.

Policy

The National Recycling Coalition encourages swift action to conduct the necessary research to address these questions, to analyze their impacts, and to apply the necessary modifications to the proposed standard so that they may be adopted and implemented.

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