



american cleaning institute®

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submitted electronically via regulations.gov (Docket ID No. EPA-HQ-OLEM-2022-0342)

Carolyn Hoskinson
Director
Office of Resource Conservation and Recovery
United States Environmental Protection Agency (EPA)
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Subject: Solid Waste Infrastructure for Recycling Program; Request for Information
87 Fed. Reg. 35200 (June 9, 2022); Docket Number EPA-HQ-OLEM-2022-0342

Dear Ms. Hoskinson,

The American Cleaning Institute® (ACI)¹ appreciates the opportunity to provide written comments to the Environmental Protection Agency's (EPA) Request for Information (RFI) on *Solid Waste Infrastructure for Recycling Program*². ACI's member companies are the manufacturers, formulators, and distributors of cleaning products in the United States. ACI recognizes the need to mitigate the impacts associated with the creation, use, and disposal of our product packaging. Cleaning product packaging is designed to protect the health and safety of consumers and their families, while also ensuring safe transport, storage and use of cleaning products during all stages of a product's lifecycle. ACI also recognizes the importance of Solid Waste Recycling Programs and appreciates the EPA's ongoing efforts to enhance and improve the programs. ACI and its members are committed to taking steps to improve recycling systems and encourage the use of sustainable recycling practices, including an ambitious goal to achieve 100% collection and reuse, recycling or composting of cleaning product packaging waste by 2040³. Our members are actively engaged in efforts to increase the availability of post-consumer recycled plastics and support policies to expand access to recycling, modernize technologies, and create cleaner streams of material.

¹ACI represents the \$60 billion U.S. cleaning product supply chain. ACI members include the manufacturers and formulators of soaps, detergents, and general cleaning products used in household, commercial, industrial and institutional settings; companies that supply ingredients and finished packaging for these products; and chemical distributors. ACI serves the growth and innovation of the U.S. cleaning products industry by advancing the health and quality of life of people and protecting our planet. ACI achieves this through a continuous commitment to sound science and being a credible voice for the cleaning products industry.

² Request for Information: Solid Waste Infrastructure for Recycling Program, 87 Fed. Reg. 35200 (June 9, 2022), <https://www.federalregister.gov/documents/2022/06/09/2022-12457/solid-waste-infrastructure-for-recycling-program-request-for-information>.

³ <https://www.cleaninginstitute.org/industry-priorities/sustainability/sustainability-goals/goal-value-nature>

ACI also supports the use of federal grant funds and policies to improve data collection surrounding recycling, especially those programs operated at the municipal and community levels. ACI recommends EPA consider efforts to support useful data collection and analysis concerning identifying factors that contribute to the most effective municipal and community recycling programs. Additionally, ACI supports efforts (including the use of grant funds) to establish key performance measures and indicators of the effectiveness of municipal and community recycling programs and improve awareness and use of existing recycling practices and programs. ACI recommends that the EPA use grant funds to building upon the information EPA acquires to improve existing recycling programs and to encourage the development and deployment of recycling programs in municipalities and communities that lack such programs or have programs which can be improved.

ACI is committed to working with the EPA to use grant funds to increase the awareness and understanding of materials which can be recovered and recycled, and to support financially the expansion and effectiveness of recycling programs and the creation of greater availability new facilities. These efforts should include the use of grant funds to establish educational programs as well as new facilities in ex-urban and rural communities that may lack such programs and for promoting greater awareness of the importance of recycling in communities where exiting programs may be underused. EPA should also consider working directly with municipalities to identify barriers to recycling, and gaps in available infrastructure in these communities. Finally, grant funds should be dedicated to identifying and then deploying appropriate technology and infrastructure investments, as well as educational and training resources to individuals, community-based organizers, municipal institutions, and leaders that can encourage or originate recycling programs. EPA should consider leading technologies available for deployment which can most readily increase the availability of post-consumer recycled materials, as it is clear, demand for such product is far outpaced by the existing supply. Establishing the facilities, materials collection, and transportation resources especially in parts of the country where resources may be lacking to build and sustain the necessary infrastructure.

ACI is willing to confer further with OLEM to explore mechanisms to coordinate among our members on providing information to consumers and communities concerning best practices and for encouraging consumer and municipal community driven recycling initiatives and to assisting OLEM in finding recycling solutions that evolve and advance our nation's materials reclamation systems. ACI appreciates the opportunity to comment on this RFI on *Solid Waste Infrastructure for Recycling Program*. We invite any questions about this submission and look forward to EPA's response.

Sincerely,
Kathleen Stanton

A handwritten signature in cursive script that reads "Kathleen Stanton".

Associate Vice President, Technical & International Affairs