




GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING



LIESL EICHLER CLARK
DIRECTOR

VIA E-MAIL

TO: Members of the Michigan Legislature
FROM: Liesl Eichler Clark, Director 
DATE: March 10, 2021
SUBJECT: Report on Part 175, Recycling Reporting

In accordance with Section 17505(2) of Part 175, Recycling Reporting, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, attached is the Department of Environment, Great Lakes, and Energy's (EGLE) report on recycling volumes for reportable recyclable materials for fiscal year 2020.

If you need further information, please contact Elizabeth M. Browne, Director, Materials Management Division, at 517-284-6551; or you may contact me at 517-284-6708.

Attachment

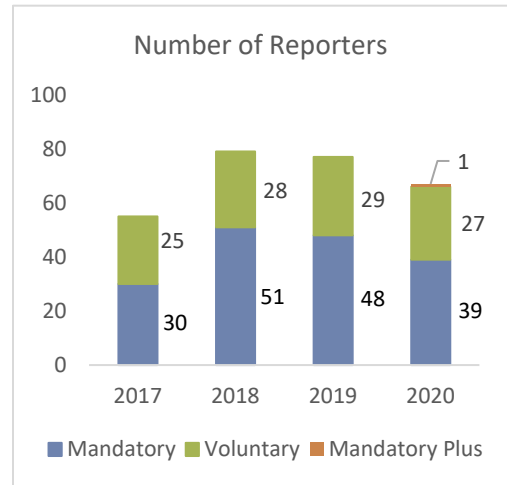
cc/att: George W. Cook, III, Legislative Affairs Director, Governor's Office
Emily Laidlaw, Policy Director, Governor's Office
Aaron B. Keatley, Chief Deputy Director, EGLE
Amy Epkey, Senior Deputy Director, EGLE
Travis Boeskool, Legislative Liaison, EGLE
Dale Shaw, EGLE
Elizabeth M. Browne, EGLE
Robert Jackson, EGLE
Rhonda Oyer, EGLE
Kathy Tetzlaff, EGLE
Jeff Spencer, EGLE
Amy Karana, EGLE



Fiscal Year 2020 Report

Part 175, Recycling Reporting, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), requires recycling establishments to report each year on a portion of commonly recycled materials that could contribute to calculating a statewide recycling rate. This is a summary of what was reported through the system during the fourth year of the program.

The law focuses on the data regarding waste diversion and recycling collection for seven types of materials: paper, plastic, glass, ferrous and nonferrous metals, textiles, and single stream recyclables. In addition to recycling establishments that are required to report, additional facility types can also opt in to report voluntarily through the program.



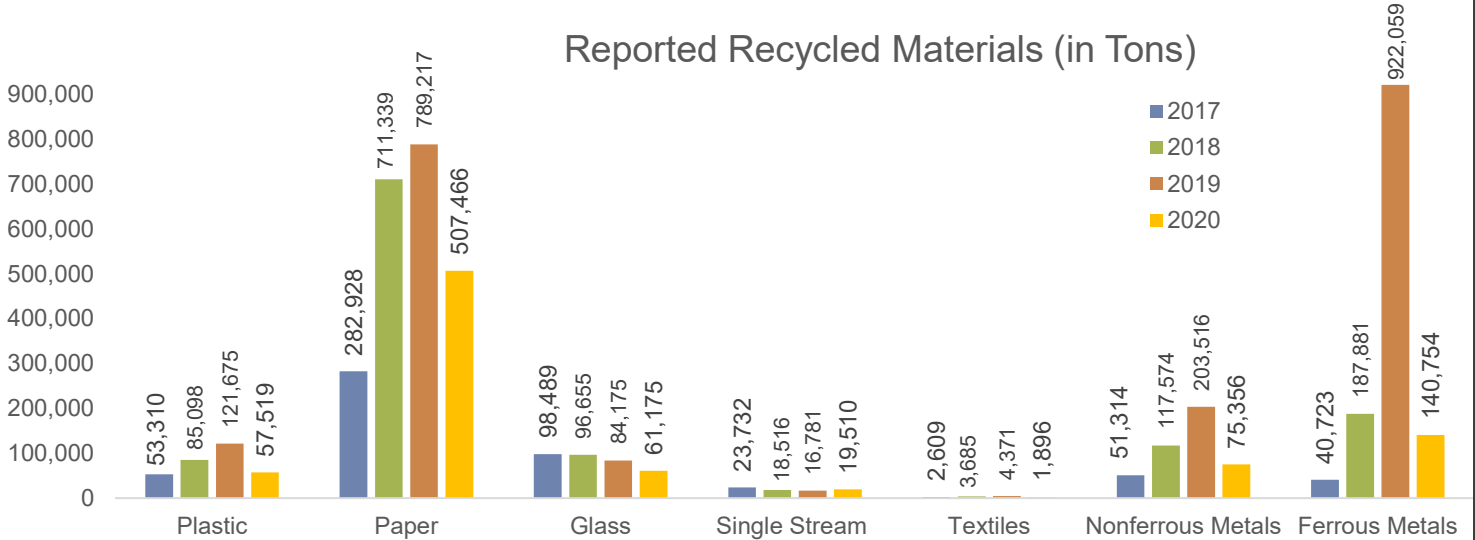
At the end of the fourth year (November 2020), organizations identified themselves as engaging in recycling activities by registering 67 locations with the online Michigan Recycling Reporting Program. The Program includes three reporter types: Mandatory, for required recycling establishments; Voluntary, for exempt facilities that choose to report; and Mandatory Plus, for required recycling establishments that choose to also report on additional material types not required in statute. While most of the organizations participating in fiscal year (FY) 2020 were individual, it should be noted some of these locations shared common ownership but were located at different physical addresses. In FY 2020, 99 percent (66 out of 67) of the registered organizations also reported their recycling data through the system.

FY 2020 was filled with unprecedented challenges due to the COVID-19 pandemic. Although considered critical infrastructure, many recycling establishments were closed temporarily or for an extended period, in some cases making collection more difficult and decreasing processing during this time frame. Other specific impacts to the waste and recycling stream are unknown but are expected to have impacted the totals reported. Also impacting FY 2020 numbers were efforts to pinpoint the recycling establishments specifically described within Part 175 that manage solely household or commercial waste and verify their reported recycled amounts. This initiative was to increase the quality and accuracy of registrations and reports and allow for more of an “apples to apples” comparison between the reports over time. Due to these efforts and other impacts, such as COVID-19 protocols, fewer reporters participated. Some organizations went out of business, some opted out of voluntary reporting, others no longer recycled or collected, some only recycled industrial materials, and others consolidated multiple separate reports into one. This led to a significant decrease in metals that were reported, as a large portion of the metals reported in FY 2019 came from an industrial stream. Some other data anomalies and large shifts from year to year can be attributed to a previous focus on and inclusion of a wider range of factors, such as reporter types and material streams.

Recycling

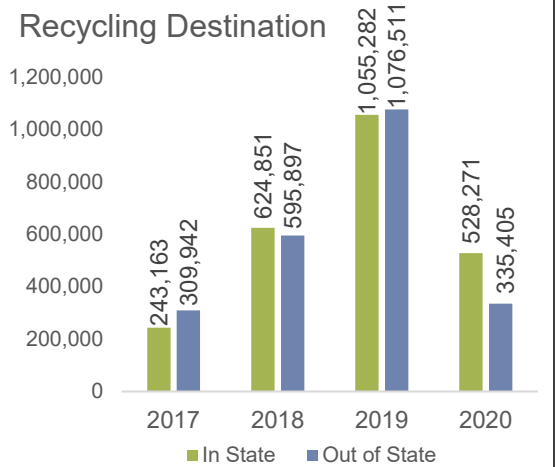
A total of 863,677 tons of recyclables were reported as recycled in FY 2020. The data shows a decrease in recycling of most materials reported as recycled from FY 2019 to FY 2020. However, in FY 2019 organizations that processed industrial materials reported through the system, which drastically increased the aggregate totals for recycling. In FY 2020 measures were taken to only include reports for residential and commercial material, contributing to less material being reported overall, but creating a more accurate depiction of residential recycling in Michigan.

The amount of material sent to in-state locations to be recycled versus out-of-state locations also fluctuated from FY 2019 to FY 2020. However, a majority of materials were ultimately recycled in-state this year rather than sent out of state, which may highlight some successes of programs and efforts implemented across the state.



Moving Forward

Changes to Part 115, Solid Waste Management, of the NREPA, may occur within the next fiscal year. These statutory changes would impact Part 175 reporters by strengthening and expanding reporting requirements. A complete system revamp for reporters is being developed this year, in accordance with these expected changes. Therefore, no amendments to Part 175 are recommended at this time, as the Part 115 legislation is expected to largely influence the Part 175 Program and address many of its shortcomings, such as gaps in data, minimal enforcement provisions, and time frames in the law as they relate to consultation with interested parties. To encourage continuous improvement in participation and ensure organizations in the program continue their involvement, EGLE plans to continue with or enact the following:



- Continue ongoing communication with participants and ensure reporters' understanding of anticipated future Program changes.
- Update the Program in accordance with anticipated Part 115 amendments, as necessary.
- Develop a new reporting platform for recycling establishments to address current system issues and prepare for potential Part 115 requirements.

These efforts aim to clarify legal requirements, increase the efficiency and value of the program, and strengthen the understanding of Michigan's waste and recycling stream. For more information, visit: www.michigan.gov/recyclingreporting.