




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: April 1, 2022  
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 2021

If you need further information, please contact Elizabeth M. Browne, Director, Materials Management Division, at 517-242-2746; or you may contact me at 517-512-5992.

Attachment

cc/att: George W. Cook, III, Legislative Affairs Director, Governor's Office  
Marc Rehmann, Policy Director, Governor's Office  
Aaron B. Keatley, Chief Deputy Director, EGLE  
Amy Epkey, Senior Deputy Director, EGLE  
Travis Boeskool, Legislative Liaison, EGLE  
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Tracy Kecskemeti, EGLE  
Rhonda S. Oyer, EGLE  
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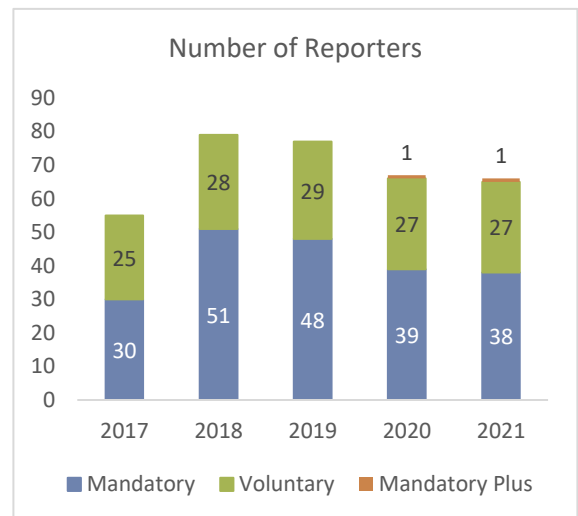


## Fiscal Year 2021 Report

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 potentially help contribute to calculating a statewide recycling rate. This is a summary of what was reported through the system during fiscal year (FY) 2021.

The law focuses on the data regarding waste diversion and recycling for seven types of materials that have been separated from household or commercial waste: 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 fifth reporting year (November 2021), 66 organizations identified themselves as engaging in recycling activities by registering their locations with the online Michigan Recycling Reporting Program (Program). The list of registered reporters can be viewed on the [Program webpage](#). 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 FY 2021 were individual, it should be noted some of these locations shared common ownership but were located at different physical addresses.

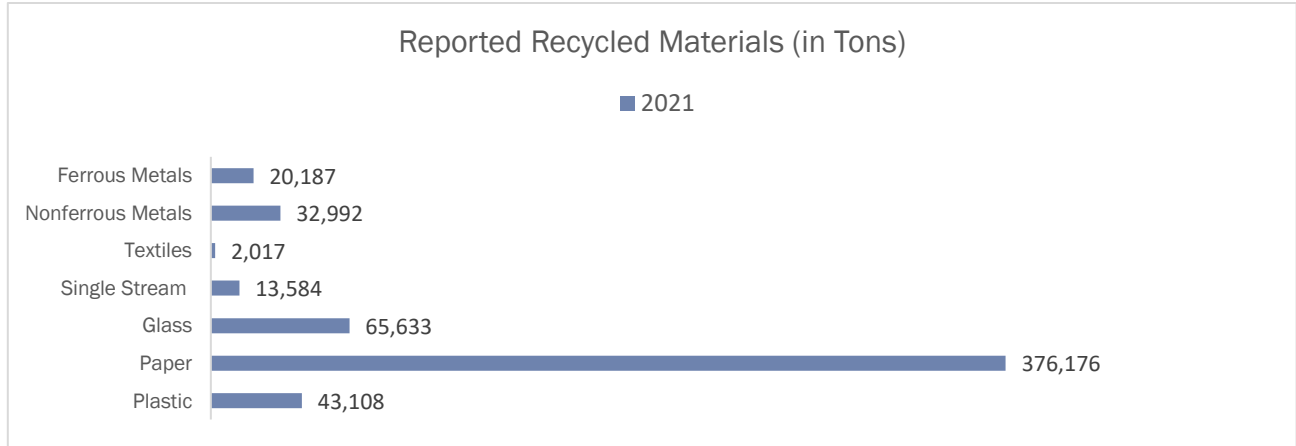


Each year, EGLE has worked to improve and refine the data review process to ensure only appropriate material types and reporters are contributing data to the Program. This has included efforts to remove end market users from reporting, remove establishments that do not handle reportable recyclable materials, and provide additional follow up with reporters to ensure a mutual understanding of what is being reported. In FY 2021, for the first time, reporters were offered the opportunity to voluntarily provide the percentage of industrial material handled. Approximately half of reporters chose to provide this information, which allowed the total reported tons to be adjusted to exclude industrial tons, in accordance with the definition of reportable recyclable materials. This effort to count only residential and commercial material resulted in significant decreases for several material types. Additionally, it was found that in previous years, significant amounts of industrial material were included in the data reported, leading to inflated tonnages in those years.

Recycling establishments continued to face challenges due to the COVID-2019 pandemic, and it is unknown exactly how this may have impacted the tonnages reported. Due to the changes in review methodology and the resulting reported tonnage shifts, it is not appropriate to compare FY 2021 values with those presented in previous annual reports. Therefore, this report reflects only the values reported for FY 2021.

# Recycling

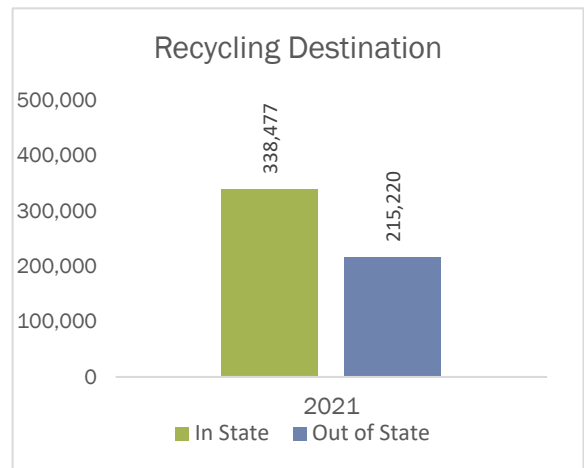
A total of 553,697 tons of recyclable materials were reported as recycled in FY 2021.



Most of these materials were reported to be recycled at an in-state destination, rather than being sent out of state.

## Moving Forward

Amendments 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 for many recycling establishments. A system revamp for reporters will be developed in accordance with these expected changes; however, the delayed passage of these amendments creates uncertainty regarding long-term reporting requirements for recycling establishments. No amendments to Part 175 are recommended at this time, as the Part 115 legislation is expected to 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, EGLE plans to continue with or implement the following:



- Engage in and document deeper consultation with interested parties.
- Continue a concerted and consistent effort to identify and contact all recycling establishments that do not currently report.
- Reevaluate the Program in accordance with anticipated Part 115 amendments, as necessary, and ensure understanding from participants and reporters in the Program.
- Enhance the 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](http://www.michigan.gov/recyclingreporting).