

WEST COAST REFUSE & RECYCLING COALITION



California Refuse
Recycling Council

Trish Roath
Executive Director, CRRC North
1121 L Street, Suite 505
Sacramento, CA 95814
Phone: 916/444-2772
Fax: 916/442-0623
Email: trish@crrcnorth.org

Lya Kingsland
Executive Director, CRRC South
1851 East First Street, Suite 1220
Santa Ana, CA 92705
Phone: 714/245-0995
Fax: 714-245-0171
Email: lrk@astor-kingsland.com



Oregon Refuse &
Recycling Association

Kristan Mitchell
Executive Director
PO Box 2186
Salem, OR 97308-2186
Phone: 503/588-1837
Fax: 503/399-7784
Email: kristanm@orra.net



Washington Refuse &
Recycling Association

Brad Lovaas
4160 6th Avenue SE, Suite 205
Lacey, WA 98503
Phone: 360/943-8859
Fax: 360/357-6958
Email: brad@wrra.org

To: WTO/TBT National Notification and Enquiry Center of the People's
Republic of China

Tel.: +86 10/84603889 /84603950

Fax: +86 10 84603811

E-mail: TBT@AQSIQ.GOV.CN

and The Ministry of Environmental Protection of the People's Republic of
China

Notification: G/TBT/N/CHN/1211

Title: Catalogue of Solid Wastes Forbidden to import into China by the End of
2017 (4 classes, 24 kinds) (2 page(s), in Chinese)

RE: Comments Regarding TBT Notification 17-3880, G/TBT/N/CHN/1211
entitled: Catalogue of Solid Wastes Forbidden to Import into China by the
End of 2017 (4 classes, 24 kinds) (2 page(s), in Chinese)

POC: Eric Bock, Counsel
West Coast Refuse and Recycling Coalition

Tel: +1.202.730.1272

E-mail: bock@ebocklaw.com

Statement of the West Coast Refuse and Recycling Coalition

The West Coast Refuse and Recycling Coalition (WCRRC) appreciates the opportunity to provide comments regarding the July 18, 2017 Notification to the World Trade Organization from the Ministry of Environmental Protection (MEP) of the People's Republic of China. The notification announced MEP's intent to forbid by the end of 2017 the import into China of 4 classes, 24 kinds of solid wastes, including plastics waste from living sources, unsorted waste paper and waste textile materials. The WCRRC respectfully requests that the ban be delayed to allow the

recycling industry in the United States to work with China to ensure the environmental protection it seeks is realized while maintaining the environmental and economic benefits to both nations of a robust trade in these valuable recyclable materials.

Background on WCRRC

The WCRRC is composed of three state associations - the California Refuse Recycling Council, the Oregon Refuse & Recycling Association, and the Washington Refuse & Recycling Association – whose member companies collect, transport, process, recycle and dispose of the bulk of municipal solid waste generated on the nation's West Coast. The companies in Oregon and California carry out these functions under contracts, franchises and licenses with local governments, while the companies in Washington operate under state-issued permits and city contracts. The companies respond to mandates in state solid waste management statutes and to directives from the local governments in the exercise of their police powers to protect human health and the environment. Those mandates, in particular, include meeting stringent waste diversion and recycling goals. In turn, WCRRC member companies have made significant investments in vehicles, equipment and facilities to meet their obligations under these arrangements with local governments.

Potential Impact of Ban

The ban will severely impact hundreds of recycling programs and recycling infrastructure built in California, Oregon and Washington that have for decades provided substantial environmental benefits, energy savings, economic efficiencies, and thousands of jobs. These recycling programs have flourished, and the capacity of recycling infrastructure needed has been lessened, because of China's import of the recyclable material it now seeks to ban. In turn, the use of imported recyclable materials as needed feedstock by China's manufacturers has reduced the costs and environmental impacts of manufacturing and generated substantial economic growth in China. This dynamic would be seriously undermined by the ban, jeopardizing the sustainability of the recycling programs and infrastructure in our states and certainly disrupting the benefits realized by Chinese manufacturers.

The recyclable materials that cannot be exported to China will overwhelm the ability of existing recycling programs and infrastructure to process them. To expand that ability will take time and securing of the necessary funding. There is also a current lack of domestic market demand for the volume of recyclable materials that will be banned. As a consequence, the recyclable materials will likely be disposed in landfills and waste-to-energy plants removing the environmental benefits, in particular reduced greenhouse gas emissions, their use provides. The increased volume of recyclable materials that will be

available will also drastically lower their value in the commodities markets threatening the economic viability of recycling programs and the investments made in associated infrastructure.

Endorsement of Concerns Raised and Offers of Assistance by National Recycling Groups

The WCRRC incorporates by reference the concerns regarding the import ban raised by the Institute of Scrap Recycling Industries (ISRI) in its August 28, 2017 filing, and by the Solid Waste Association of North America (SWANA) and the National Waste & Recycling Association (NWRA) in their respective filings on August 31, 2017.

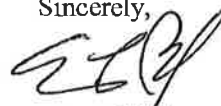
Specifically, WCRRC shares the following concerns raised by the three national trade groups:

- The need for clarity on the exact materials that are subject to the ban. In particular, what materials are encompassed by the term “plastic waste from living sources” and “unsorted waste paper”?
- The need for a transition period of several years to allow the recycling industry and commodity markets to adapt to the ban.
- The need for China to consider enforcement of standards on quality for specific recyclable materials rather than banning them.

WCRRC supports the efforts to prevent environmental harm caused by the dumping of waste materials in China, including recyclable materials improperly mixed with waste. To that end, WCRRC urges the MEP to accept the offer by the three trade associations to collaborate with China to help achieve that objective.

The WCRRC again thanks you for the opportunity to comment on the Notification and stands ready to provide additional information on the recycling industry in our three states that will assist you in addressing the concerns we have raised.

Sincerely,



Eric P. Bock
Counsel for WCRRC

September 28, 2017

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cc: The Honorable Jay Inslee, Governor, State of Washington
The Honorable Kate Brown, Governor, State of Oregon
The Honorable Jerry Brown, Governor, State of California
The Honorable U.S. Senator Maria Cantwell
The Honorable U.S. Senator Patty Murray
The Honorable U.S. Senator Jeff Merkley
The Honorable U.S. Senator Ron Wyden
The Honorable U.S. Senator Kamala D. Harris
The Honorable U.S. Senator Dianne Feinstein
Alexis Strauss, Regional Administrator, U.S. EPA Region 9
Michelle Pirzadeh, Regional Administrator, U.S. EPA Region 10
WCRRRC Board of Directors
Trish Roath, Executive Director, CRRC North
Lya Kingsland, Executive Director, CRRC South
Kristan Mitchell, Executive Director, ORRA
Brad Lovaas, Executive Director, WRRRA