December 4, 2020

Ms. Caroline Emmerson
Acting Associate Director
Resource Conservation and Sustainability Division
Office of Resource Conservation and Recovery
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N. W.
Washington, D.C. 20460

Docket ID No. EPA-HQ-OLEM-2020-0462

Re: Docket ID No. EPA-HQ-OLEM-2020-0462
U.S. Environmental Protection Agency (EPA)
National Recycling Strategy

Dear Ms. Emmerson:

The American Iron and Steel Institute (AISI) is pleased to submit comments on EPA’s draft National Recycling Strategy. AISI serves as the voice of the American steel industry in the public policy arena and advances the case for steel in the marketplace as the preferred material of choice. AISI also plays a lead role in the development and application of new steels and steelmaking technology. AISI’s membership is comprised of integrated and electric arc furnace steelmakers, and associate members who are suppliers to or customers of the steel industry.

Steel is the most recycled material in the world, and steel products are 100% recyclable at the end of their useful lives. In 2019 over 60 million tons of steel scrap was consumed in the production of over 90 million tons of steel in the U.S., and every ton of recycled steel conserved 2,500 pounds of iron ore, 1,400 pounds of coal and 120 pounds of limestone. This recycled steel comes from many sources such as automobiles, end-of-life buildings, appliances, food cans, etc. In fact, one of the most important features of steel as a material is that virtually any steel product can be recycled into any other steel product, such that a steel beam can become another beam, a refrigerator, a food can or a car door.

AISI has participated in all three EPA America Recycles Summits, and we are an original signatory to the America Recycles Day 2018 Pledge. While the vast majority of recycled steel comes from industrial sources, AISI fully supports the EPA’s efforts to increase the recycling of municipal solid waste (MSW) in the U.S. as described in the draft strategy. More specifically, we support the EPA goals of strengthening domestic markets for products with recycled content and developing standardized recycling definitions and performance measures.
Thank you for the opportunity to provide comments on this draft National Recycling Strategy. We are available to discuss these comments with EPA, and we look forward to further cooperation between AISI and EPA on the subject of recycling.

Sincerely yours,

Mark A. Thimons
Vice President, Sustainability
American Iron and Steel Institute