



Illinois Recycling Association

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Governor Mitch Daniels
Office of the Governor
Statehouse
Indianapolis, Indiana 46204-27097

Dear Governor Daniels:

The Illinois Recycling Association recently received information from the Indiana Recycling Coalition (IRC) regarding proposed policy changes to the definition of recycling and the Integrated Recycling Plan in Indiana. According to IRC the Indiana Department of Environmental Management (IDEM) is reinterpreting the definition of recycling to include waste-to-energy processes, like incineration (also called waste-to-energy). Consequently, the IRC is gravely concerned about the future of recycling in Indiana, should this initiative be implemented. The Illinois Recycling Association agrees with the concerns of IRC and respectfully submits the following reasoning for your consideration.

- Indiana has adopted a waste management hierarchy that subordinates waste-to-energy to recycling. We believe that recycling's status is defined in statute and should not be arbitrarily changed. IC 13-19-1-1, Section 1 states: "the policy of the state is that source reduction, recycling; and other solid waste management alternatives; are preferred over incineration and landfill disposal as solid waste management methods."
- The United States Environmental Protection Agency has established a hierarchy the most environmentally sound strategies for managing commodities and solid waste. Source reduction (including reuse) is the most preferred method, followed by **recycling** and composting, and, lastly, disposal in combustion facilities and landfills.
- Other states have adopted a similar hierarchy including the following from Illinois; (1) volume reduction at the source; (2) reuse or recycling of waste; (3) combustion with energy recovery; (4) combustion for volume reduction; and (5) disposal in landfill facilities.
- Redefining recycling to include waste-to-energy would allow Indiana to divert today's recycling funds (from dedicated grant and loan programs established in legislation) to non-recycling activities. The IRC believes that it was the clear intent of the legislature that the dedicated recycling funds be spent on recycling activities as defined in statute. The diversion of recycling funds to waste-to-energy, contradicts both legislative intent and established standards.
- Recycling is a proven economic development and benefit management option. On a per ton basis, recycling creates 10 times more jobs than incineration or landfilling. The direct, indirect and induced economic benefits from recycling play a significant role in any states' fiscal stature. Recycling is a sustainable economic tool that benefits both local and state government as well as residents.
- The results of these policy changes would be the **weakening** or elimination of solid waste management districts (SWMD) and their recycling and waste prevention programs at the local level. SWMDs are the backbone of

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recycling in Indiana and are essential to accomplishing the state's goal of 50% waste reduction. It is imperative that districts continue to play this critical role.

The Illinois Recycling Association joins the IRC in fundamentally opposing changes in recycling policy which will negatively effect existing recycling infrastructure and divert designated recycling funds to less desirable commodity and waste management options.

Sincerely,



Rod Fletcher
President, Illinois Recycling Association

cc: Melissa Kriegerfox, President, Indiana Recycling Coalition