



November 14, 2006

Governor Mitch Daniels  
Office of the Governor  
Statehouse  
Indianapolis, Indiana 46204-2797

## RECYCLING ALLIANCE OF TEXAS

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### MISSION STATEMENT

The Recycling Alliance of Texas is dedicated to the furtherance of natural resource conservation and recycling to ensure economic sustainability and environmental quality in Texas.

### AFFILIATED COUNCILS

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San Antonio  
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Dear Governor Daniels:

The Recycling Alliance of Texas 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 Recycling Alliance of Texas agrees with the concerns of IRC and respectfully submits the following reasoning for your consideration.

- Indiana has legislation in place that subordinates waste-to-energy below 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 ranked the most environmentally sound strategies for managing 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 Texas; (1) source reduction and waste minimization; (2) reuse or recycling of waste; (3) treatment to destroy or reprocess waste to recover energy or other beneficial *resources if the treatment does not threaten human health, safety, or the environment*; or (4) land disposal. (emphasis added)
- 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.
- 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 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 Recycling Alliance of Texas 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 waste management options.

Sincerely,

*Ron Wilkins*

Ron Wilkins, CHMM  
President, Recycling Alliance of Texas

cc: Melissa Kriegerfox, President, Indiana Recycling Coalition