

Talking Points

Recycling: Part of Essential Critical Infrastructure

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As state and local governments work to determine what businesses are “essential” to protect public health and safety, as well as economic and national security, the following talking points provide support for recognizing recycling operations as essential businesses that supply critical raw materials to keep manufacturers in operation. Recycled metal, paper, plastics, and other commodity-grade materials feed critical U.S. manufacturing operations that are producing the rebar, wiring, tubing, transportation, packaging, and other key materials that are needed for everything from construction of new hospitals to the manufacture of new hospital beds, ventilators, toilet paper and other essential supplies needed to keep Americans safe and the economy running during this critical period.

Recycling Integral to Critical Manufacturing Supply Chain

A number of manufacturing industries that recyclers regularly supply have been officially designated as part of the U.S. “Critical Manufacturing Sector” by the U.S. Department of Homeland Security (DHS), including: primary metals manufacturing (i.e., iron and steel mills and ferrous alloy manufacturing, alumina and aluminum production and processing, and nonferrous metal production and processing); machinery manufacturing; electrical equipment, appliance and component manufacturing; and transportation equipment manufacturing (source: <https://www.cisa.gov/critical-manufacturing-sector>).

This week the DHS further defined critical manufacturing as “... the manufacturing of materials and products needed for medical supply chains, **and for supply chains** associated with transportation, energy, communications, food and agriculture, chemical manufacturing, nuclear facilities, the operation of dams, water and wastewater treatment, emergency services, and the defense industrial base. Additionally, workers needed **to maintain the continuity of these manufacturing functions and associated supply chains.**” (“*Guidance on the Essential Critical Infrastructure Workforce: Ensuring Community and National Resilience in COVID-19 Response*”, p 10 (emphasis added)). The manufacturing of materials and products is wholly dependent on manufacturers’ ability to obtain the feedstock necessary to feed their operations. **Thus, the definition provided by DHS is inclusive of the operations necessary for the collection and processing of the raw materials – whether secondary or primary - needed to supply critical manufacturing.**

- The U.S. steel industry relies on ferrous scrap as its largest single raw material input. 70% of all U.S. produced steel and stainless steel is made from ferrous and stainless scrap supplied by recyclers. In fact, the modern U.S. steel industry has been built around the ability of scrap recyclers to process and deliver high-quality iron and steel scrap.
- More than 75% of U.S. paper mills depend upon recovered fiber from recycling operations for their daily production needs, and a significant number of paper mills in the U.S. rely on recovered fiber for 100% of their feedstock.

¹https://www.cisa.gov/sites/default/files/publications/CISA_Guidance_on_the_Essential_Critical_Infrastructure_Workforce_508C_0.pdf

- Recyclers are responsible for supplying 58% of the feedstock to tissue mills throughout the United States, which are responsible for producing the toilet paper and tissues needed every day by citizens throughout the U.S. and which are currently in critical supply.
- Aluminum producers in the United States have become increasingly dependent on recycled aluminum as their main raw material input due in part to the large energy and cost savings associated with consuming secondary aluminum scrap over primary. More than half of all aluminum consumption by manufacturers in the United States comes from scrap.
- Copper and copper alloy production in the United States is also heavily dependent on scrap as a raw material input, which requires scrap recyclers to continue operating. Copper's anti-microbial properties are a key element to reducing the spread of disease, and are widely used in hospitals and other settings to reduce transmission rates. Copper scrap provides approximately one-third of the supply of all copper, brass, and bronze produced in the U.S.
- The increased demand for and delivery of food items are dependent upon food packaging which in turn is produced using a variety of grades of recovered paper and plastics, made from recyclables collected and processed by the scrap recycling industry.

As the above examples illustrate, recycling operations are an essential part of critical manufacturers' supply chain, supplying 40% (on average across all commodities) of their raw material needs. Without the continued supply of specification-grade scrap into these operations, many of these companies would be forced to curtail their operations.

Public Health & Safety

Recyclers play an essential role in helping state and local governments manage their needs and responsibilities by providing a critical outlet for the recyclable materials generated within their communities, without which these valuable commodities would build up and not only be lost for critical supply to manufacturers, but end up wrongfully in the waste stream. Recyclers across the country work daily with local municipalities to ensure recyclables are collected, processed and successfully enter the manufacturing supply chain. The vast majority of recycling operations supporting municipal programs (often called scrap recycling facilities, Material Recovery Facilities, or MRFs) are for-profit operations, are not government-owned, and are therefore at risk of being inadvertently shut down by otherwise well-intended emergency measures.

Summary

As states, localities, and the Federal government take the important steps needed to limit the spread of COVID-19 in our communities, we ask that recycling operations be recognized as essential businesses allowed to remain open so as to continue to be able to supply critical manufacturing with the raw materials they need to operate and meet the current demands of keeping Americans safe. This is with the understanding that recycling operations deemed essential adhere to all requirements on maximizing remote work and observing necessary precautions prescribed by the CDC, OSHA, and state and local authorities in their operations, in order to protect workers and their families.