



ISRI is the voice of the recycling industry, promoting safe, economically sustainable and environmentally responsible recycling through networking, advocacy and education.



December 16, 2020

Governor Eric Holcomb
State House
Room 206
Indianapolis, IN 46204-2797

Dear Governor Holcomb,

On behalf of the approximately 6,228 workers in the Scrap Recycling Industry within the state of Indiana, we sincerely appreciate all your efforts and the efforts of your administration in combatting one of the worst pandemics in our nation's history.

As COVID-19 cases continue to surge, many governors are facing difficult decisions as to whether to once again close certain "non-essential" business sectors they had reopened after spring lockdowns. We recognize these actions are further complicated by the fact that some jobs and businesses are essential and necessary to sustain or protect life and maintain critical infrastructure. Regrettably, the lack of a coherent federal policy to curb the pandemic has led to a patchwork of restrictions that do not provide the consistency necessary in determining what is considered essential.

We commend you for recognizing earlier in the year that manufacturing is essential critical infrastructure. The U.S. Department of Homeland Security referenced in its guidance that the manufacturing of materials and products is wholly dependent on manufacturers' ability to obtain the feedstock necessary to feed their operations. Thus, the definition of "critical manufacturing" 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. Unfortunately, there is continuing confusion in this area in need of clarification. **We urge you to provide certainty for the critical employees and businesses of the recycling industry by formally recognizing that recycling operations are essential and necessary for the continued supply of raw materials for the manufacturing of critical products and equipment relied upon by citizens of Indiana every day.**

Recycling operations are the first link and an essential part of critical manufacturers' supply chain, supplying an average of 40% of U.S. manufacturing raw material needs. Without the continued supply of specification-grade recyclable materials into these operations, many of these manufacturing companies would be forced to curtail their operations. For instance:

- Paper recycling facilities are responsible for supplying 58% of the feedstock to paper mills throughout the United States, which are responsible for producing the toilet paper and tissues needed every day by U.S. citizens. More than 75% of U.S. paper mills utilize recovered paper from recycling operations for their daily production needs.
- Copper scrap provides approximately one-third of the supply of all copper, brass, and bronze produced in the United States. For the fight against COVID-19, we know that 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 and copper alloy production in the United States is heavily dependent on recyclable copper scrap as a raw material input, which requires scrap recyclers to continue operating during these critical times.



Recycling is essential in meeting manufacturers' needs now and into the future, not just for critical infrastructure but for everyday life necessities. Recycled metal, paper, plastics, and other commodity-grade materials feed U.S. manufacturing operations that produce 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 and ventilators that are in short supply as the number of cases surge. The same is true for the manufacture of toilet paper, paper towels, corrugated cardboard boxes used for online shipping, electronics for home schooling, remote telework, and other essential supplies needed to keep Americans safe and the economy running during this critical period. This supply chain cannot be halted and restarted without significant supply disruptions that would ripple throughout the entire U.S. manufacturing chain.

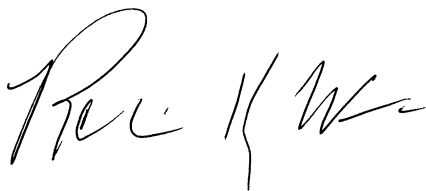
Recyclers in Indiana also work daily with local municipalities to ensure recyclables are collected, processed and successfully enter the manufacturing supply chain, thus supporting local governments in delivering such services to the community. The vast majority of recycling operations that support municipal programs (often called scrap recycling facilities, Material Recovery Facilities, or MRFs) are for-profit operations. Since they are not government-owned operations, they are at risk of being inadvertently shut down by otherwise well-intended emergency measures. The ramifications would not only hurt manufacturing, but also prove contrary to public health goals by complicating the entire residential recycling system.

From the beginning, the recycling industry has implemented enhanced safety precautions in line with CDC guidelines to protect employees and customers, shifted eligible staff positions to teleworking and adjusted facility layouts to ensure physical distancing while continuing to provide essential services during the shutdowns. As your administration takes steps to limit the spread of COVID-19 in light of this new surge of cases, we ask that all recycling operations in Indiana be designated "essential" to public health and welfare, as well as to the state's and our nation's economic infrastructure.

If you have any questions, please contact the ISRI chapter president representing Indiana:

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Sincerely,



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