



## Recycling Policy Position and Principles

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Metal can recycling has significant positive environmental and economic impacts that underpin the metal can manufacturing industry's position of producing the premier sustainable package. While the metal can's enviable high recycling rates—[45 percent](#) for aluminum beverage cans and [58 percent](#) for steel cans—are widely noted with beverage and food companies and consumers, it is the metal can's economic value that drives the recycling system that should be acknowledged. The can manufacturing industry is committed to capturing more used metal cans and has engaged with non-government organizations (NGOs), along with federal and state policymakers, to advance recycling and environmental stewardship.

Policymakers across the country are considering legislation to improve recycling rates, shift recycling costs from taxpayers to consumer product goods companies and create new end markets or improve struggling ones. This legislation includes extended producer responsibility (EPR), beverage container recycling refund (i.e., bottle bill, deposit return system) programs and/or minimum recycled content requirements. As Congress and state legislatures look at potential measures, CMI welcomes the opportunity to discuss financing options for recycling programs and infrastructure investments that will increase the amount of used metal cans collected and the quality of material that material recovery facilities (MRFs) sell to processors that make new can sheet.



***CMI recommends the following principles and positions for lawmakers in Congress and the states as they consider the legislative options:***

### **Set Realistic Recycling Targets That Are Achievable for All Can Types**

- If recycling targets for metal cans are necessary, they should be set by material type (e.g., aluminum, steel) and not by container type (e.g., aluminum aerosol can, aluminum pet food can, and aluminum beverage can). Setting targets by metal can type adds complexity requiring greater data collection, therefore increasing cost to who is responsible for collecting the data.
- Legislation with minimum recycled content levels for metal packaging is unnecessary because of existing strong end markets. Other material types that do not have sufficient demand for buyers of their material once it is scrap would benefit from such requirements. Legislative and regulatory overreach could unintentionally disrupt the global metal market.

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### Provide More Collection Outlets for Consumers to Recycle

- Provide more opportunities and convenience for consumers to recycle metal cans at single and multi-family households, public spaces and commercial establishments that sell consumer goods, as well as education on why recycling is important.

### Require Improved Data Collection

- Support better state-by-state data collection so program performance and residential access to recycling is better understood and investment decisions maximize impact.
- Congress should direct the Environmental Protection Agency (EPA) to create a process for uniformity in data collection and reporting.

### Prioritize Long-term Solvency of Recycling Systems

- Support policies that prioritize the recovery and recycling of higher value materials since they best support recycling systems financially.
- Each package should pay its own cost for recycling. Other packages should not subsidize less valuable packaging's cost to recycle.
- Ensure fees set on difficult to recycle packaging pay for its end-of-life disposal.
- CMI believes eco-modulation is an important tool that will drive producers to use more sustainable packaging with positive environmental impacts such as metal cans.
- Confirm revenue or fees raised from recycling programs are used only within the recycling system to ensure long-term financial stability and provide necessary investment in infrastructure

*CMI recommends policymakers consider the following principles when writing legislation:*

### Metal Can Makers Voice in Brand Stewardship Organizations

- Provide an opportunity for the metal can industry to provide input on base fee and determination of eco-modulation factors in EPR programs for packaging.
- Incorporate eco-modulation factors that consider the environmental performance of packaging types in an appropriate manner.

### Aluminum Can Industry Principles for Beverage Container Recycling Refund Programs

CMI and the Aluminum Association advocate for efficient, effective beverage container recycling refund systems. The current recycling refund states are critical sources of the aluminum cans the industry gets back. According to the [Container Recycling Institute](#), recycling rates for aluminum cans are about 36 percent in non-deposit states and rates average 77 percent in states with deposit programs. The used aluminum cans received from deposit states tend to be far cleaner and of higher quality, making recycling easier and more economical.



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CMI and the Aluminum Association have endorsed best practice principles alongside 10 other diverse organizations for well-designed recycling refund programs:

- Any entity managing the system should have strong government oversight and must meet performance targets.
- Appropriate deposit values to avoid market distortion and to catalyze high recycling rates.
- Unredeemed deposits should enhance the recycling system.
- Include all beverage types and containers with minimal exceptions.
- Easy, convenient and equitable redemption options are available as part of everyday activities for all consumers.
- Each material pays its own way.
- Use technology and clear labeling to reduce fraud.

These elements are based on insights gathered over many months from deposit experts in industry, government and non-profit organizations, as well as best practices from programs inside and outside of the United States.

Visit [www.recyclingrefundswork.org](http://www.recyclingrefundswork.org) for more information on recycling refunds.

### Conclusion

The United States must improve its recycling system to remain competitive with other countries. Increasing the recycling of metal cans and their reuse as domestic manufacturing feedstock is smart policy and makes the U.S. metal can industry less reliant on imported can sheet. Reusing metal to make new can sheet decreases the carbon footprint of the United States.

Metal cans play a significant role in recycling programs, thanks to their high intrinsic value. CMI believes metal cans should be credited for the critical environmental and economic role they play in America's economy. Policies should recognize the role higher value materials play in supporting healthy recycling systems by prioritizing their collection. These positive attributes solidify the aluminum and steel can as the superior, sustainable package for food and beverage container categories.



### Can Manufacturers Institute

The Can Manufacturers Institute (CMI) is the national trade association of the metal can manufacturing industry and its suppliers in the United States. The can industry accounts for the annual domestic production of approximately 130.7 billion food, beverage, aerosol and general line cans; which employs more than 28,000 people with plants in 33 states, Puerto Rico and American Samoa; and generates about \$15.7 billion in direct economic activity.

CMI members are committed to providing safe, nutritious and refreshing canned food and beverages to consumers in the most sustainable packaging. For more information, visit [cancentral.com](http://cancentral.com).