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Solid Waste Association of North America: Comments on Proposed Updated Catalogue of Solid Waste Forbidden to Import into China

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The Solid Waste Association of North America ("SWANA") on August 31st submitted comments to the World Trade Organization ("WTO") and the People's Republic of China in regards to China's intent to update its Catalogue of Solid Wastes Forbidden to Import into China.

SWANA describes itself as an organization of more than 9,000 public and private sector professionals committed to advancing from solid waste management to resource management through their shared emphasis on education, advocacy and research.

As noted in a previous post ([see post here](#)):

China had notified WTO of its intent to ban the import of certain scrap materials by the end of the year.

SWANA's comments provides some detailed information on both:

- The SWANA Organization
- Municipal Solid Waste Recycling in the United States

The comments include a detailed discussion of the organization's view of the potential impact of the Catalogue's impact on municipal solid waste recycling. Points raised by the comments include:

- 10,000 municipal recycling programs serve communities in the United States and Canada (supplemented by hundreds of drop-off programs involving deposit recyclables)
- The United States utilizes a decentralized system for managing waste and recyclables (meaning there is no national waste diversion or recycling goal)
- Regulatory authority is delegated to states and local government
- Quick modification or halt of the thousands of United States recycling programs would be difficult
- North America recycling programs have suffered from China's Operation Green Fence and National Sword Initiative
- Recycling programs would be unable to recover from the proposed ban (including disruption caused by closing a significant outlet for paper and plastic)
- Ban of such exports would likely result in their disposal in landfills and waste energy facilities in North America
- Public confidence and support for recycling programs would be greatly diminished

The comments incorporate by reference the Institute of Scrap Recycling Industries' previously submitted comments and also respectfully request that People's Republic of China consider a longer transition period to "allow customers and suppliers to adapt to a policy that will have a substantial negative impact on North American recycling programs."

[A copy of the comments can be downloaded here.](#)