



March 26, 2020

The Honorable Greg Abbott
Governor of Texas
P.O. Box 12428
Austin, Texas 78711

Dear Governor Abbott:

On behalf of over 17,000 workers in the Texas recycling industry, we greatly appreciate all your recent efforts in fighting one of the worst pandemics in our nation's history.

Over the past several days, many local governments have been ordering the shutdown of "non-essential" businesses. We recognize and fully support the need to take these drastic actions in order to stop the spread of COVID-19. However, we urge you to help provide consistency in the determination of what is considered essential by formally recognizing that recycling operations are essential businesses, necessary for the continued supply of raw materials for manufacturing in Texas and beyond, including the steel, plastic, and papermaking industries that are part of the foundation of our country's manufacturing economy and that are relied upon by Americans every day for producing everything from automobiles, appliances and construction equipment to food packaging, writing papers and toilet paper. The recycling industry here in Texas is essential to supplying manufacturers with the materials necessary to produce steel, aluminum, paper, plastics, rubber and many other materials.

Recycling is the first link in the manufacturing supply chain, supplying 40%, on average across all commodities, of the U.S. raw material needs. Over three-quarters of U.S. paper mills utilize recovered paper from recycling operations for their daily production needs. 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. Texas collected and recycled over 2.5 million tons of paper in 2015 helping to contribute to the over \$3.3 billion that recycling annually provides to the Texas economy. Companies such as Smurfit Kappa in North Texas rely on a steady supply of curbside recycled paper and cardboard to produce new cardboard boxes. This supply chain cannot be halted and restarted without significant supply disruptions that would ripple throughout the entire manufacturing chain. There are now some municipal recycling operators that have ceased the separate collection of recycling and are now diverting that material to the landfill.

Several of the 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). The DHS has updated its "Guidance on the Essential Critical Infrastructure Workforce: Ensuring Community and National Resilience in COVID-19 Response" to now include, "workers necessary for 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."

The updated language by the DHS recognizes that manufacturing is dependent on manufacturers' ability to obtain feedstock for their operations. Recyclers are essential businesses that supply critical raw materials to keep manufacturers in operation. According to DHS, "The Critical Manufacturing Sector is crucial to the

THE MISSION OF STAR IS TO ADVANCE RECYCLING THROUGH PARTNERSHIPS, EDUCATION, AND ADVOCACY FOR THE BENEFIT OF TEXAS

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economic prosperity and continuity of the United States. A direct attack on or disruption of certain elements of the manufacturing industry could disrupt essential functions at the national level and across multiple critical infrastructure sectors.”

Recyclers in Texas also play an essential role in helping 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 be lost for supply to manufacturers, ending up improperly in the waste stream. Recyclers across Texas work daily with local municipalities and businesses to ensure these recyclables are collected, processed and successfully enter the manufacturing supply chain. Many of these recycling operations in Texas (often called Material Recovery Facilities, or MRFs) are for-profit operations and not government-owned and are therefore at risk of being shut down by well-intended emergency measures.

As your administration takes steps to limit the spread of Coronavirus and limit commercial activity, we ask that all recycling operations across Texas be designated “essential” to public health and welfare, as well as to our state’s economic infrastructure.

Sincerely,

Jordan Fengel
Executive Director