

Illinois Statewide Recycling Needs Assessment Advisory Council Meeting Minutes

Monday, September 14, 2026, 12:00 pm CT

WebEx Webinar

1. Welcome: Roll Call

- a.** Attendees: John Pausma, Aaron Harmon, Pete Varney, Lisa Disbrow, Nicole Willett, Joshua Connell, Mark Weintraub, Teresa Kernc, Mercy Davison, Brad Cole, Christina Seibert, Alec Laird, Lisa Linnell, Seema Keshav, Donovan Griffith, Elizabeth Sheaffer, Madeline Norris, Taylor Loeber, Carol Patterson
- b.** Not in attendance: Tomas Vujovic, Mike DiMucci, Becky Tracy, Adam Spaulding, Cole Stollard, Andrea Densham, Darnell Tingle, Frank Pettis, Machele Henderson, Patricia Bonaguro
- c.** A quorum was present.
- d.** Illinois EPA staff attending: Vishnu Srinivasaraghavan, Cassandra Clark
- e.** Open seats on the Advisory Council include one representative of each: a county with a population of 50,000-1,000,000.

2. Meeting Minutes

- a.** August 10 and August 24 meeting minutes were reviewed. Motion by Brad Cole, second by Lisa Disbrow; all in favor, minutes were approved.

3. Illinois EPA Updates

- a.** Agency comments on the draft needs assessment were submitted to Eunomia, including IEPA's agreement with the comments submitted by the Advisory Council.
- b.** The Agency met with Eunomia on September 14 to review the comments and indicated that edits to the report are being made.
- c.** A schedule for availability of an updated report is not confirmed, but the Agency anticipates there may be revised portions of the report available before the November 1 due date.
- d.** The Agency will follow up with Eunomia on the status of responses to questions submitted by the Advisory Council for the August 10 meeting.

4. Considerations for Packaging EPR Policy – Industry Associations

- a.** A presentation from Natalie Betts, accompanied by Justin Short and Cory Bloom, with the Recycled Materials Association (ReMA) was provided, addressing recycling end markets for all types of packaging materials. The presentation included:
 - i.** ReMA overview, representing private sector end markets with material neutrality
 - ii.** Overview of residential recycled materials supply chain: hauler/collection, MRF sortation, broker, secondary processor, end market, manufacturer

- iii. ReMA definition of end market: first entity that processes recyclable material into recycled feedstock to be used for manufacturing as a virgin feedstock substitute
- iv. Review of MRF outputs and end markets for aluminum, paper, glass, steel, plastic, with note that MRFs may also have materials they recover that are not packaging materials (e.g., scrap metal, rigid plastics)
- v. What makes something recyclable, with commodity value (adjusted for cost to collect, sort, remove contaminants, and transport to market) being greater than or equal to the value of a substitute or virgin commodity
- vi. Discussion of material sources for markets, noting that residential packaging materials are managed by facilities that primarily recycle commercial and industrial material because those sources are preferred due to greater volume and quality / value
- vii. ReMA position on packaging EPR, that it should only be use for hard-to-recycle products and should:
 - Allow recyclers to opt out if they don't want to receive funding from the system
 - Have recyclers represented in advisory boards
 - Include flexibility in recyclability lists to adjust to market conditions with on-ramp / off-ramp considerations as market realities change
 - Focus source reduction on reduced use of virgin material (not reduction of material in total)
- viii. ReMA position on responsible end markets in packaging EPR policy, including:
 - Every responsible recycler should be able to prove themselves and not be excluded
 - Criteria detailed in statute is not best practice
 - Third-party national verification system is supported, and ReMA is engaged with CAA on this
 - Confidential business information must be protected
 - Clear definition of end market as the first entity making the substitution for virgin material
 - Minimizing administrative risk and cost
 - Being material-neutral and end-use-neutral for end market development to allow market competition; market resiliency needs demand, which may not always result in recycled materials going to new packaging

b. Questions from Advisory Council members on the ReMA presentation:

- i. Can you elaborate on material circularity approaches? – Packaging format may not be recyclable back into the same format, but it can be brought into other products to maintain circularity.
- ii. What is ReMA's position on PCR requirements? – ReMA supports eco-modulation to incentivize recyclability and recycled content, but costs of

compliance need to be kept in mind. They also support PCR requirements in plastics.

- iii. How much recycled plastic comes back in packaging compared to other applications? – Direct data was not available to share in the meeting. It was noted that food-grade quality is a concern, and it is also difficult to continue to track the source of material as it moves through the processing supply chain to confirm original use as multiple materials (residential packaging, commercial / industrial pre-consumer and scrap) are blended.
 - iv. When considering recyclability, with plastics in particular is there consideration of the chemicals in the material or its toxicity? – This is addressed through the demand and resulting value for a material that includes chemicals or toxics.
 - v. Considering states that have passed packaging EPR legislation, which represent good policy and which have challenges from ReMA's perspective? – Responsible end market requirements are of primary focus. Colorado has a good structure. Oregon and California include yield as a criteria for responsible end markets and this is a barrier / concern. California does not segregate virgin from recycled material for plastics. Source reduction can make products less recyclable, harder to sort, and more likely to be contaminants; you should consider objectives when setting any requirements.
- c. The Advisory Council briefly reviewed the list of presentations and materials received to date from various associations, including Circular Action Alliance (CAA), Oregon DEQ, AMERIPEN, Association of Plastic Recyclers (APR), American Forest & Paper Association (AF&PA), Glass Packaging Institute (GPI), Can Manufacturers Institute (CMI), and Carton Council. Each have provided perspective on packaging EPR based on their material or their role. These should be considered in the context of Illinois's recycling system and statutory objectives of increasing recycling and recovery of packaging materials.
- d. Upcoming presentations will include updates on implementation in other states and on reuse/refill.
- e. The Advisory Council has not heard from associations representing MRFs or local governments, but there are members on the Advisory Council that represent those groups.

5. Policy Recommendations

- a. The Advisory Council brainstormed parameters to address in policy recommendations to be made by the Advisory Council, with the following potential topics identified by members:
 - i. Source reduction and material toxicity: concern about plastics and their toxicity, particularly in food and beverage packaging, and source reduction as an important consideration.

- ii. Existing infrastructure and stranded assets: concerns about protecting existing and planned MRF investments; changes to acceptable materials lists could require facility modifications and potentially leave existing infrastructure underutilized; consideration of existing infrastructure when developing future policy was discussed as an important element.
- iii. End markets and processing costs: materials should not be added to recycling programs without responsible end markets; processing costs vary by facility and material type and can change as the composition and volume of the recycling stream change; will MRFs share cost information to support evaluation of costs/benefits of adding materials to an acceptable materials list?
- iv. Consumer behavior and education: consideration of consumer preferences, willingness to pay, and the behavioral changes that may be necessary for EPR programs to succeed should be included; recycling instructions and material choices can be confusing for consumers so simplifying packaging choices could improve participation; clear, visual recycling instructions are valuable; contamination and the placement of non-recyclable materials in recycling containers remain ongoing challenges in current recycling programs.
- v. Domestic recycled content: important to ensure that recovered materials generated domestically are used in domestic manufacturing; there is a need to distinguish domestically generated recycled content from materials imported from other countries when measuring progress.
- vi. Costs to consumers: concern that costs imposed on producers may ultimately be passed through to consumers; there should be transparent evaluation of potential cost impacts, particularly in the context of consumer affordability, and considering the consequences of proposed recycling, minimum recycled content, redemption, and reuse policies.
- vii. Consistency with other states: important to consider approaches adopted in other states and maintain harmony / consistency where possible to minimize manufacturer disruption; consistent definitions, covered materials, and program requirements could reduce market disruption and support end-market development; flexibility for producer responsibility organizations to establish targets and eco-modulation factors (rather than setting firm numbers in statute) should be considered.
- viii. Packaging design and EPR implementation: questioned whether producers have changed their packaging in states with EPR laws (discussion that packaging redesign can take several years and that it may be too early to assess the effects of recently implemented programs); eco-modulation is a potential mechanism for incentivizing more recyclable packaging through differences in producer fees and payment of bonuses / charge of maluses; consider relevance and limitations of comparing U.S. implementation with longer-standing programs in Europe; producer response on packaging is expected to be based on consumer preferences.
- ix. Out-of-state infrastructure: maintain flexibility for market locations because access to regional facilities outside Illinois could help control program costs and avoid unnecessary infrastructure development.

- b.** The Advisory Council discussion and report could include:
 - i. Establishing parameters or “guardrails” for future Illinois packaging policy, recognizing that members may not reach consensus on all policy elements.
 - ii. Areas for consideration: covered entities, the scope of materials and generators, protection and utilization of existing infrastructure, and the extent to which policy should align with approaches in other states.
 - iii. Identification of shared / consensus recommendations as well as areas where members hold differing views, given that significant differences of opinion may remain and that the Council may not reach agreement on all elements within the remaining schedule.

6. Questions and Comments from Council Members

- a.** None

7. Public Comment Period

- a.** None

8. Next Meeting

- a.** September 28, 12-1:30pm CT via WebEx

9. Adjournment

- a.** The meeting adjourned at 1:25 pm CT; motion by Brad Cole, second by Nicole Willett.