

To: Eunomia Research & Consulting, Inc.

From: Statewide Recycling Needs Assessment Advisory Council
Christina Seibert, Chair

Subject: *DRAFT Illinois Statewide Materials Management Needs Assessment*: Compilation of Key Questions and Clarifications for Discussion with the Consultant Team

Date: August 3, 2026

The below summarizes several of the questions and clarifications identified by the Statewide Recycling Needs Assessment Advisory Council (AC) to date, offered for both context for the Eunomia team and for critical responses to facilitate the AC's continued review and preparation of comments on the draft report within the statutory timeframe afforded to us.

Of important note:

- The information contained herein does not represent the entirety of the feedback from the AC, focusing instead on the most critical elements impacting our continued review.
 - Questions are generally organized by topic, not necessarily by order in which they appear in the report.
 - Questions in **bold** are of most interest to be directly addressed prior to or during the August 10, 2026 AC meeting. Non-bold questions will be asked as time allows.
 - Responses to all questions contained herein are requested no later than August 14.
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Definitions

1. Recycling: Please clarify the definition of recycling applied to the packaging and paper products considered in the Needs Assessment. Does "recycling" include only materials actually processed and returned to the economic mainstream as raw materials or new products, or does it include materials that are collected from recycling carts (which may or may not be recovered for recycling), materials that are incinerated, or managed in other ways?

Data / Data Management

1. **When will all primary and secondary data be provided in an organized, comprehensive, and cited manner? Without a usable compilation of the data that was derived from multiple sources, the analysis and findings of the report are difficult to evaluate and find credible.**
2. Much of the report relies on assumptions that are not fully explained. The methodology states that fragmented data required the use of "reasonable assumptions", but the report does not consistently explain what those assumptions were or how sensitive the results are to them. Please provide detail on the assumptions and basis for the assumptions for the following (note this is not an exhaustive list):

- a. Multi-family household recycling yields were “limited”, with only 2 municipalities providing data with a large range, so a blended average from an area with high proportion of multi-family households was used (page 74) – but there is no presentation of what the multi-family data showed, and the blended rate is likely overstating performance. What were the actual values, and how do they compare to the estimated value used?
 - b. Multi-family recycling costs from only Niles and Champaign were used. However, other communities also provide multi-family recycling (either through exclusive contracts – e.g., Evanston – or through commercial franchises that include multi-family). Why weren’t these sources used?
 - c. Why were rates for non-residential curbside collection only used from Lake County and other far northeast Illinois communities?
 - d. Drop-off cost data varied from the 6 municipalities that provided data and “the cost per ton figures...varied greatly” so an average cost from other states was used instead. Why? What was the range for Illinois data, and how can local, actual data be disregarded for use of other states’ data?
 - e. Chicago Park District data was used for parks and inflated for larger state/national parks. How is the largest park district in the state representative for all parks? What is the basis for increasing costs by 25% for state/national parks? Why weren’t contract rates for state (Illinois DNR) and national (National Park Service) parks FOIA’d?
 - f. Public transit recycling collections are assumed once per week with no stated basis for that assumption; that seems a low level of collection for urban transit locations in particular.
 - g. Surveyed MRF tipping fees for the largest regions of the state were “assumed to not reflect the true cost of sorting” and instead a higher rate based on an average of other regions was used. This is cherry-picking of the data – why? Or why not use the alternate noted value of \$65/ton?
3. **Briefly explain how the Red-Amber-Green coding was determined and its usefulness considering that “some” data (Amber) covers a very broad range of completeness. More information on the level of completeness would be beneficial.**
 4. **Please provide the whole number data on which all percentage calculations have been made (both numerator and denominator values) for all report tables for review and comprehension of the calculated values.**
 5. **What were the counts of total facilities and haulers surveyed, and how many responded? How is it determined whether the data is sufficient or statistically significant?**

Existing Conditions

1. Collection service:
 - a. **When will the list of current access to recycling service by municipality be provided?**

- b. How is access to existing subscription (individually contracted) service distinguished from genuinely unserved gaps?**
 - c. Were retail drop-off collections (e.g., for plastic bags / plastic films) considered?
 - d. For estimations of recycling collection programs for non-responding areas, how many communities were “estimated” within the >1,500 population threshold?
 - e. How does regression modeling estimate service access for communities not included in survey responses?**
 - f. Provide a list of all drop-off centers considered.**
 - g. Based on the data presented, an estimated 83% of residents have curbside recycling access and an estimated 81% of residents have access to drop off centers. What percent of residents have no reasonable access to either? How many communities with over 1,500 population have no curbside programs, and where are they located?**
- 2. Recycling processing capacity:
 - a. Where is out-of-state recycling capacity included?
 - b. MRFs are not permitted, and therefore there is no “permitted” capacity; how was the statewide capacity determined, and does it include only current operating shifts or additional capacity that would be available if an additional processing shift was added?**
 - c. Why does Table 4-11 show Region 2 as having more than 50% available capacity but the text says those facilities operate near capacity?**
- 3. Materials:
 - a. How are plastic clamshells (Table 4-5) defined, and how are they distinct from PET thermoforms and Rigid PP that are separately listed?
- 4. End markets:
 - a. Has the Recycled Materials Association (ReMA) been consulted to provide recycling system inputs and data, including markets for various materials? Not including their data may result in omitting recycling activity going directly to processors / end markets (e.g., aluminum and steel cans going to metal recyclers / scrap yards).**
 - b. End market discussions combine intermediary processors / recyclers with manufacturers. Can distinctions in the stages of recycling that the “end market” facilities are engaged in be provided?
 - c. Did you confirm that all end markets identified are commercially operating and accept MRF-sorted / post-consumer materials? There is concern that some facilities may only accept pre-consumer scrap.
- 5. Recycling / composting rates:
 - a. MRF operators indicate that a 0% recycling rate for glass in regions 3-7 is not accurate and a portion of glass from at least 3 of the regions does not go to ADC. Why is 0% glass recycling assumed?**
 - b. Where is composting rate data?**

6. Packaging sold into the state:
 - a. **How do the sold into state estimates for Illinois compare to producer data reported under packaging EPR programs in Oregon and Colorado on a per capita basis?**
 - b. **For plastics, how do the sold into state values totaling about 627,000 tons make sense considering the waste characterization study calculated about 795,000 tons of plastics (almost all of which were characterized as packaging) are disposed in the state from residential sources alone?**

Costs / Modeling

1. **When will the logistics model be provided?**
2. Does the model include costs associated with service transitions, contract disruptions, or other structural changes?
3. How does the model differentiate between urban / rural variations by region?
4. How do MRF costs take into account commodity revenue? The MRF survey asked for a tipping fee, but it did not provide any definition of whether the tipping fee is inclusive of adjustments for material revenue or if there are separate revenue sharing rates/conditions.
5. **Modeling for curbside recycling assumes ALL curbside communities (all municipalities with population >1,500) receive weekly recycling collection. This should be modeled assuming bi-weekly recycling for any municipalities that do not currently have curbside recycling available and sustaining current frequency of weekly or bi-weekly recycling collection in municipalities that have service now. There is no basis for weekly collection given that weekly data only shows about 20 pounds more recycling per household per year compared to bi-weekly, and it over-estimates costs to provide access.**
6. **An interim condition calculating the cost and recycling performance with curbside and drop-off recycling access provided by the criteria in the statute should be provided. This answers a key question of what the cost of access and its impact alone would be, which is valuable for policy setting.**
7. Why is volume-based pricing applied only to urban areas, and where is the data supporting it resulting in material increase in recycling quantities?
8. Did modeling consider drop-off / special collection for packaging like plastic film and aerosols, or were those assumed to be added to curbside collection?
9. Modeling of mixed waste sorting facilities using data from the Titus secondary processing study is flawed. A secondary processing facility would manage MRF residual material, not the mixed waste stream. What is the basis for applying this study to mixed waste sorting?

Waste Characterization

1. For Table 3-1:
 - a. Where is the source data and notation of adjustments for landfill disposal tonnage presented?
 - b. Please provide a corrected table; data for Regions 1, 3, and 4 are identical, which is assumed to be an error.**
2. **For purposes of the packaging and paper products evaluations for future conditions, was ICI composition data excluded? If not, in what manner was it utilized? Section 3 of the report is not germane to the needs assessment as it blends residential and ICI data; this should be revised to fully segregate the sources.**
3. Why is expanded polystyrene considered to be “Not Readily Recoverable”? In Region 2 at least, there are several Special Collection options and these could be replicated in other areas of the state - as examples, Cook County and Mount Prospect have received [grants](#) from the Foodservice Packaging Institute’s Foam Recycling Coalition.

Recycled Content in Packaging

1. The methodology for plastics is skewed based on a focus on US Plastics Pact and PET PCR data. Resulting PCR content for plastics at 23-33% seems high based on challenges in using PCR content in food and beverage containers.

Compostable Packaging

1. What is the source of information on acceptance of compostable products at Illinois compost facilities?