

Illinois Statewide Recycling Needs Assessment Advisory Council Meeting Minutes

Monday, November 10, 2025, 12:00 pm CT

WebEx Webinar

1. Welcome: Roll Call

- a. Attendees: John Pausma, Tomas Vujovic, Aaron Harmon, Nicole Willett, Mark Weintraub, Mike DiMucci, Marta Keane, Kevin Schnoes, Brad Cole, Christina Seibert, Cole Stollard, Alec Laird, Andrea Densham, Seema Keshav, Frank Pettis, Elizabeth Sheaffer, Madeline Norris, Carol Patterson, Machele Henderson
- b. Not in attendance: Daphne Hulse, Lisa Disbrow, Joshua Connell, Becky Tracy, Kristina LoRusso, Rod Kleckler, Darnell Tingle, Donovan Griffith, Taylor Loeber, Patricia Bonaguro
- c. A quorum was present.
- d. Illinois EPA staff attending: Vishnu Srinivasaraghavan, Cassandra Clark
- e. Guest presenters attending: Elizabeth Start (Start Consulting Group); Andy Hackman (Serlin Haley LLP on behalf of AMERIPEN); Danielle Waterfield (AMERIPEN)
- f. Open seats on the Advisory Council include one representative of each: a retailer.

2. Meeting Minutes

- a. September 8 meeting minutes were reviewed. Motion by Elizabeth Sheaffer, second by Brad Cole; all in favor, minutes were approved.

3. Illinois EPA Updates

- a. Data collection and surveying by Eunomia and Crowe is ongoing. An update on data collection and next steps will be provided at the next meeting.
- b. IEPA will follow up with any Advisory Council members who need to complete required state trainings for the year.

4. Needs Assessment Element: Environmental Justice / Language Access

- a. A presentation was provided by Elizabeth Start of Start Consulting Group (Start), a member of the Eunomia project team.
- b. Start provided an overview of the firm and their scope of work for the Needs Assessment, which includes evaluating environmental justice (EJ) and multi-lingual needs statewide and how/where EJ communities are disproportionately impacted by waste and recycling facilities.
- c. For language, Start is identifying communities with limited English proficiency (LEP), mapping communities with existing multi-lingual communication activities, and completing virtual listening sessions.

- d. Start discussed how LEP communities have been identified for primarily Spanish, Chinese, and Polish languages, with about 300 municipalities identified with LEP populations of 100 or more. The majority of these (235) have little to no recycling information translated to non-English languages.
- e. Virtual listening sessions are being planned by partnering with multi-lingual and culturally specific organizations in January-March 2026, with 2 sessions per top language and 10-15 participants per session.
- f. Advisory Council members are requested to contact Start to:
 - Recommend potential partner organizations for listening sessions
 - Support Start to build relationships with organizations where they exist now
 - Collaborate on existing work
- g. Questions from Advisory Council:
 - How will findings impact Eunomia's study / modeling? Answer: Integration of findings from Start's work into the Needs Assessment is being discussed with Eunomia, and an update will be provided to the Advisory Council in the future.
 - Regarding recycling access, are you surveying availability of information, or participation? Answer: The survey covers both access to recycling information in various languages and evaluation of current recycling participation.

5. Packaging EPR Policy Position and Elements (AMERIPEN)

- a. A presentation was provided by Andy Hackman (Serlin Haley LLP) and Danielle Waterfield (Policy Director & General Counsel, AMERIPEN).
- b. AMERIPEN (American Institute for Packaging and the Environment) presented information on its organizational membership and background. With more than 100 members across the U.S., AMERIPEN works at both the state and federal level to advocate on packaging policy as a unified and trusted voice for its members.
- c. AMERIPEN reviewed differences between policies in states currently implementing packaging EPR programs in areas including definitions, producer responsibilities, funding levels and structures, and performance goal setting.
- d. Key definitions for AMERIPEN include definitions of producer, consumer, covered materials, and recycling. Perspective on these definitions were each shared, highlighting that clarity is important and having consistency across states will make programs and reporting more efficient.
- e. Producer responsibility model components were reviewed, including that programs are producer run and governed (with Circular Action Alliance – CAA – being the only selected producer responsibility organization to date) with some options for alternative

collection plans for select materials. Producers are responsible for planning and data collection, and implementing states and producers are still working on how to best complete this. States provide plan oversight, with most states including an advisory board to assist in review and comment on the plan. In more recently adopted legislation, states have included state-level registration of service providers to facilitate data and operating protection for service providers, which seems to be working well so far in Oregon and Minnesota.

- f. Financing structures vary in states with existing policy and has been evolving, with Oregon a shared-responsibility model with producers covering about 28% of costs, Colorado a full producer responsibility model with producers covering all costs, and escalating cost coverage in Minnesota, Maryland, and Washington at 50/75/90% over time to maintain some cost involvement from all stakeholders. Defined covered activities vary, with collection not covered in some states, transportation and processing included in all states, and landfill disposal never covered. Regarding infrastructure investment, ownership by producers should not be precluded, but use of existing infrastructure should be encouraged.
- g. Performance goals should be data-driven from the needs assessment and included in the program plan (not statute). Performance goals include recycling, reuse, and composting rates. Ideally, goals will be harmonized and streamlined across states and be adaptable and equitable.
- h. Acceptable materials lists should be generally uniform statewide, with considerations for local waivers if exceptions are necessary in certain parts of a state (e.g., due to infrastructure differences). Performance goals need to be linked to acceptable materials, including making adjustments to goals as new materials are added. Acceptable materials should include both curbside-collected materials and non-curbside collection options / materials that are not suited to curbside collection currently.
- i. Fees should be defined by the PRO and include variations for eco-modulation and recyclability / reusability / compostability of materials. Timelines should include relatively quick registration of producers, with plan submission and program start-up occurring over a longer period (AMERIPEN suggests 3 years) to allow time for the program to be planned and developed.
- j. AMERIPEN noted that programs may require modifications based on experience over time, and that statutes should be flexible to accommodate this through the plan to the degree possible.
- k. Questions from Advisory Council:
 - For cost reimbursements, does AMERIPEN believe the cost should be what is specified in municipal contracts, or a formula? Answer: Under a 90% reimbursement threshold, it is appropriate for costs to be reimbursable at the contract rate because they have been procured / negotiated in good faith.

- How are states addressing chemicals in packaging? Answer: Only California has addressed this in their packaging law. A better way to address chemicals of concern in packaging would be through the Toxics in Packaging legislation that is in place in many states (including Illinois) to prevent added complexity in an EPR program and additional responsibility on the PRO.
- Regarding the consumer definition, why are non-residential consumers not recommended to be included? Answer: Producers feel that businesses should be providing their own recycling services as part of their business operations. Corporate entities should continue to cover that cost, and businesses have cleaner streams and different needs than residential generators. There is also concern that some businesses would be both a producer and a consumer and complicate funding and reimbursement.
- Why would a MRF invest in infrastructure now or in the future if there is the possibility of producers owning infrastructure and MRF owners ending up with stranded assets? Answer: AMERIPEN questioned whether it is constitutional to prohibit ownership by any entity (note that input from Alec Laird was that there is precedent in Illinois where this is already done for certain products, so it is likely not to be a concern). Minnesota's law gives preference to the use of existing infrastructure, with conditions under which producers could develop infrastructure being defined in the legislation.

I. Questions from public:

- What is AMERIPEN's perspective on producer ownership of infrastructure? Answer: AMERIPEN believes it is not necessary or cost-effective in general, but they wouldn't want to preclude the option for materials where a producer may be able to set up a program or infrastructure that doesn't exist currently.
- Does AMERIPEN have a model bill or list of key elements that they would support? Answer: This is constantly evolving. However, AMERIPEN has made public statements in support of legislation in states including Minnesota, Maryland, and Washington that can be referred to.

6. Questions and Comments from Council Members

- a.** No other questions were raised by the Advisory Council.

7. Public Comment Period

- a.** Public comment was solicited from attendees; no comments were received.

8. Next Meeting

- a.** January 12, 12-1:30 pm CT via WebEx with updates on data collection and analysis from Eunomia and Crowe.
- b.** A meeting cancellation for December 8 will be sent.
- c.** Meetings will continue to be planned monthly.

9. Adjournment

- a.** The meeting adjourned at 1:28 pm CT; motion by Elizabeth Sheaffer, second by Machele Henderson.