

## **ATTACHMENT A**

### **Guideline for Development of Statewide Survey to Assess Recycling Activity in Texas**

***A broad coalition of interested parties, the Texas Recycling Data Initiative (TRDI) Steering Committee, has developed recommendations to guide a data collection process for a statewide assessment of recycling activities and recycled materials in Texas. Language used in this document is not intended to reference existing statute or specific industry standards.***

#### **WHY THIS IS NEEDED:**

There is limited information on recycling activities in Texas, and currently there is no comprehensive statewide information collected on the amount of material recycled in Texas. Some very limited data are collected at the state and regional level, but lack consistency.

Collection of statewide data on recycling, through a voluntary process, would accomplish the following objectives.

- Identify, by comparing generation to recovery, which materials are under-collected and where infrastructure should be located to increase their recovery rate.
- Support industry in making investment where the most opportunity lies, and in the areas of the State where their services are most needed.
- Provide State-designated planning regions (Councils of Governments) with data to support their State-mandated regional planning efforts.
- Enable informed infrastructure/market development in areas where there is unmet need for material collection and processing.
- Facilitate quantifying and highlighting the economic and environmental benefits of recycling.
- Allow the industry to be proactive by participating in a voluntary data collection mechanism in lieu of a mandated system.
- Provide legislators with tools to make informed decisions at a statewide level.
- Generate publicly accessible data (in aggregate form) which will help local governments to better plan and improve public services and validate or continue recycling program funding, and demonstrate the value of recycling programs.
- Enable funding agencies, non-profits, local governments and community groups to identify areas of need and target their efforts and resources.
- Provide feedback to the general public to reinforce and validate recycling efforts.

#### **SURVEY DESIGN:**

The TRDI Steering Committee makes the following initial recommendations.

#### **WHAT...**

- Participation in the survey will be voluntary.
- The Survey will count material recycled in some past period of time defined by the Steering Committee (i.e. past calendar year, perhaps one or two years prior to survey initiation).
- A material or object will be counted for the purposes of this survey if it conforms to the following criterion:
  - That it was recycled; and
  - That it is no longer useful or marketable, regardless of its generation point (including from residential, commercial, industrial, and agricultural activities), which might typically have been abandoned or disposed; and

- That it was beneficially used regardless of its value in lieu of using virgin materials or energy sources; and
- That it is quantifiable.
- The survey will include, but not be limited to the following examples.
  - Traditional recyclables such as newspaper, corrugated cardboard, aluminum and steel cans, plastic bottles and tubs, glass bottles and jars, boxboard, junk mail, office paper, appliances, yard trimmings (organics), etc.
  - Emerging recyclables such as e-scrap (computers, TVs, etc.), plastic films, textiles, fluorescent bulbs, etc.
  - Construction and demolition materials such as asphalt, concrete, composition roofing shingles, ferrous and non-ferrous scrap metals, wood waste, mattresses, carpet, etc.
  - Other materials that may not be post-consumer but are recycled or beneficially used in the State and can be quantified should be included as well, such as fly ash, bottom ash, flue gas desulphurization materials, landfill alternative daily cover, waste liquids, and sludges, etc.
- The Survey will count recycled material in tons per year.
- The Survey will NOT collect pricing or customer information.
- The survey will request categorization of material by generator segment, i.e. industrial, commercial, agricultural, and residential - but NOT by unique generator.
- The survey will request categorization of material by Council of Government region (24 regions).
- The survey will exclude manufacturing scraps returned directly to the production process of the same product.
- The survey will capture material data from major retailers and those generating materials sent directly to market, at the broker or mill level. Steering Committee participation by major retail will be essential to identifying surveyees for this sector.
- The survey will capture data from material exported off-shore, at the processor/broker level. Surveyees will be limited to North America.

#### **WHO...**

The Survey will target the following sectors.

- Processors (i.e. MRFs), end users (i.e. mills), and brokers/marketers where there is not overlap with processors and end users, but NOT generators
- Processors and end users in surrounding areas who may be accepting materials from Texas

#### **HOW...**

- The survey process will be guided and administered by the TRDI Steering Committee made up of representation by trade and professional associations and public sector organizations. Steering Committee members are expected to represent their industry sector.
- Steering Committee members will be responsible for identifying survey targets and providing contact information to third party data aggregators, and will advocate full participation of their constituents in the survey.
- Steering Committee will be the point of contact for represented constituents for questions and information dissemination.
- Survey will be accompanied by a cover letter specifically addressing intent and data security concerns, and will identify partnering organizations such as trade and professional associations, representatives of public sector organizations, and any other organizations who sign on to participate.
- Survey should be conducted primarily via a web-based medium, although multiple means may be necessary to complete the process, including post or telephone follow-up.
- Data will be collected through an independent third party not subject to open records rules to ensure confidentiality of proprietary business information. Third party would operate under a firm confidentiality

agreement with strict preclusions for data dissemination or sale under penalty of litigation.

- The selected third party must meet the following minimum criteria.
  - Must have a proven capability to ensure data confidentiality
  - Must have experience with similar projects and demonstrated capabilities
  - Must provide positive references
- The third party will aggregate and own data.
- The third party will NOT release raw data. Data will be released in aggregate form only, and will not be correlated to specific respondents. Data will be organized by Council of Government region (24 regions). A list of survey respondents will be available, but not correlated to any specific data.
- The Steering Committee members will play a role in reviewing the aggregated data and list of respondents to identify obvious anomalies in the data, and will identify potential survey respondents who have not been included or did not respond.
- The third party shall not release aggregated data and/or survey results without authorization from the Steering Committee.
- The survey should be repeated on even years in advance of legislative session.

#### **STEERING COMMITTEE REPRESENTATION:**

The following is a list of current Steering Committee member affiliations. Other members may be added.

- Construction Materials Recycling Association
- Cooperative Teamwork and Recycling Assistance
- EPA Region 6
- TARC: Houston-Galveston Area Council
- North American Hazardous Materials Management Association
- Recycling Council of Texas
- State of Texas Alliance for Recycling
- Texas Aggregates Association
- Texas Chapter of the Solid Waste Association of North America
- Texas Coal Ash Utilization Group
- Texas Commission on Environmental Quality (TCEQ)
- Compost Advisory Council
- Electronic Resource Recycling Council
- ISRI – Scrap Tire Processor Chapter
- ISRI – Gulf Coast Chapter
- National Solid Waste Management Association
- Texas Retail Association
- Carpet America Recovery Effort

## **POTENTIAL RESOURCES**

The Steering Committee, established to administer the survey process, will identify funding and other resources to support this effort. Potential funding sources may include grant or foundation funding, corporate sponsorship, voluntary contributions from interested parties, or other resources as long as funding does not conflict with this Guideline and does not compromise confidentiality or create the perception of compromised confidentiality of the raw survey results.