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Have Questions?

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Advocacy Agenda: Regulatory Policy



The recycling industry is significantly impacted by regulatory policy made in agencies and departments across the U.S. government. Thus, ISRI is continually monitoring and commenting on any and all regulations that have the potential to hinder recycling operation. Of particular note, ISRI is aggressively advocating for:

- **Resumption of the Mutilated Coin Redemption Program.** ISRI is working with the appropriate officials in the U.S. Department of Treasury and within the relevant congressional committees to gain support for resumption of the Mutilated Coin Redemption Program by the U.S. Mint, which allows U.S. scrap processors to redeem the scrap value of coins recovered in their downstream operations when they shred cars and vending machines. The U.S. Mint suspended the Mutilated Coin Redemption Program on suspicion of fraud, but it recently requested industry comments on resuming the program. During this time, ISRI presented a number of options for full resumption of the program that would fully protect the integrity of the monetary system, including creation of a trusted vendor program and audits, if necessary, for scrap processors.
- **Revision of CAA Regulations Applicable to Appliance Recycling to Reflect Congressional Intent.** ISRI will continue to work with the EPA and others to seek modifications to the current regulations applicable to refrigerant-containing appliances under Title VI of the Clean Air Act (CAA). These regulations do not follow the intent of Congress that they "shall include . . . [r]equirements that [refrigerant] contained in bulk in appliances, machines or other goods shall be removed from each such appliance, machine or other good prior to the disposal of such items or their delivery for recycling," which has led to confusion over what constitutes acceptable compliance and, thus, to enforcement actions for what the industry does not understand to be a violation of the rules.
- **Maintaining Flexibility in Stormwater Permits.** ISRI is urging EPA to fulfill the terms of a recent 2015 legal settlement approved to prevent protracted litigation of the 2015 Federal Multi-Sector General Permit (MSGP) rulemaking, which is particularly important to the recycling industry because the industry has been subject to National Pollutant Discharge Elimination System (NPDES) permitting under the Clean