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To: Chairman Howell and Members of the Michigan House of Representatives Natural Resource Committee.

The Institute of Scrap Recycling Industries is a national organization dedicated to promoting safe, economically sustainable and environmentally responsible recycling of a myriad of materials with the purpose of introducing the recycled materials into the stream of commerce for use in the production of new products. Michigan ISRI is the Michigan chapter of the national organization. As the production of material from natural resources is limited by the very nature that our planet is limited in deposits of these materials, recycling has multiple benefits. One benefit which may not come to mind is that, from a metals recovery perspective, the energy used to produce a ton of metal from virgin ore is approximately seven times that required to make a ton of the same metal by recycling scrap metal.

Michigan ISRI has primarily focused at this juncture upon HB 5812 as HB 5812 sets the platform for the remainder of the package of bills. The following is our proposal for changes to the language of HB 5812 and a brief explanation of the reasons for these proposals.

1. The object of excluding material containing iron, steel or nonferrous metals from the definition of managed material was to acknowledge and promote the benefits of having those materials processed and introduced into the stream of commerce by scrap processors. Scrap processor is a defined term in the Scrap Metal Regulatory Act (MCL 445.423 (n)). Consequently, lines 4 and 5 on P. 30 should be changed to read: "...is directed to or received by a Scrap processor as defined under the Scrap Metal Regulatory Act (MCL 445.421 *et seq.*) ..."
2. As both materials management facilities and materials recovery facilities would be entities subject to Part 115 upon enactment of these bills, the exclusion from the definition of materials management facilities identified in Section 11504 (21) (lines 13 thru 18 on P.30), should also be excluded verbatim from the definition of a materials recovery facility by adding a paragraph 24(g) on P.31.

3. As there had been great effort previously expended in working through the definition of managed material, insert “managed” at Section 11503(7)(d)(x) (P 17 line 16) as follows: (x) Other **managed** material approved ...

4. The bill does not provide a definition of “waste” although that term is used through this package of bills. Waste is generally defined as discarded or abandoned material. In that regard we propose the following:

- Section 11503(7) (P.16 Lines 27 and 28): “Diverted waste” means **discarded or abandoned** material that meets all of the following requirements:...”
- Section 11506(1) (P. 39 line 21): “Solid waste” means discarded or abandoned food waste, ...”

Sincerely,

Tony Levin

President, ISRI - Michigan Chapter