

Coalition Comment Letter

May 4th, 2026

U.S. Environmental Protection Agency

Re: Comments on Federal Register Notice 2026-05491 – Advanced Recycling and Pyrolysis (OSWI-1)

Dear Assistant Administrator Aaron Szabo and Staff:

The undersigned organizations appreciate the opportunity to comment on Federal Register Notice 2026-05491, particularly Section VI, which seeks comment on whether EPA should revise the definition of “municipal waste combustion unit” included in the other solid waste incinerators (OSWI) rules to remove “pyrolysis/combustion units.”

We represent a broad range of industries across the manufacturing, recycling, and value chain sectors. We write to express our support for clarification that pyrolysis units used for advanced recycling are not solid waste incineration units.

Why This Matters

Clear and consistent federal policy in this area is critical. Regulatory uncertainty around advanced recycling has slowed investment, limited the development of new facilities, and created confusion for businesses working to expand recycling capacity in the United States.

Providing clarity will help unlock investment, support job creation, and strengthen domestic manufacturing and supply chains.

Advanced Recycling Is a Manufacturing Process

Advanced recycling technologies, including pyrolysis, are designed to convert post-use plastics into valuable raw materials that can be used to make new products. These processes do not burn waste—they transform materials so they can be reused in the economy.

Recognizing this distinction is essential. Treating these technologies the same as combustion-based processes does not reflect how they operate and creates unnecessary barriers to growth and innovation.

Benefits Across the Economy

When supported by clear and appropriate policy, advanced recycling can:

- Support U.S. manufacturing by creating new feedstocks for domestic production
- Strengthen supply chains by returning materials back into the economy
- Create jobs and investment in communities across the country
- Reduce waste by keeping more material out of landfills

These benefits are broadly shared across industries and align with national priorities to expand domestic production and improve resource efficiency.

Our Recommendation

We encourage EPA to revise the definition of “municipal waste combustion unit” in the OSWI rules to ensure that advanced recycling technologies like pyrolysis are clearly distinguished from solid waste incineration.

Providing this clarity will support continued investment, innovation, and growth in U.S. recycling and manufacturing.

Thank you for your consideration. We look forward to continued engagement on this important issue.

Sincerely,

The Undersigned Organizations:

Acadian Seaplants Ltd

Ag Container Recycling Council

Agribusiness Council of Indiana

Agricultural Retailers Association

Alliance for Automotive Innovation

Alliance for Chemical Distribution (ACD)

American Chemistry Council

American Composites Manufacturers Association

American Fuel & Petrochemical Manufacturers

American Petroleum Institute

Chemical Industry Council of Illinois

CKS Packaging, Inc.

EPS Industry Alliance

Flexible Packaging Association (FPA)

International Sleep Products Association

Massachusetts Chemistry & Technology Alliance, Inc. (MCTA)

Michigan Chemistry Council

National Association of Printing Ink Manufacturers (NAPIM)

North Dakota Agricultural Association

Ohio Chemistry Technology Council

Pennsylvania Chemical Industry Council

Pine Chemicals Association International

Plastic Pipe and Fittings Association

Plastic Pipe Institute

Plastics Industry Association

PRINTING United Alliance

The Chemistry Council of New Jersey

The Vinyl Institute

U.S. Chamber of Commerce

Virginia Manufacturers Association