



SWANA[®]

SOLID WASTE ASSOCIATION
of North America

June 17, 2004

Bill Smith, Senior Environmental Specialist
City of Tacoma Solid Waste Management
3510 South Mullen Street
Tacoma, WA 98409

Dear Mr. Smith,

Thank you for your May 28 letter concerning the recent SWANA Applied Research Foundation Report entitled the Effectiveness of Municipal Solid Waste Landfills in Controlling the Releases of Heavy Metals to the Environment. It is very unfortunate that this report is being used to discourage product stewardship and recycling programs for electronics and other metal-containing products. As clearly stated in the report, SWANA endorses and actively promotes the implementation of economically and environmentally sound waste reduction and recycling programs for products containing heavy metals.

As evidence of this support, in 2001, SWANA's International Board of Directors unanimously approved our Product Stewardship Policy. The purpose of this policy is to establish guiding principles for SWANA and its members to use as they collaborate with manufacturers and designers in developing programs to manage products at the end of their life. To quote from that document, which can be found in its entirety on our web site:

"Policies that promote and implement product stewardship principles should create incentives for the manufacturer to design and produce products that are made using less energy, materials, and potential pollutants, and which result in less waste (through reduction, reuse, recycling, and composting) and use less energy to operate. These policies should also create incentives for the development of a sustainable and environmentally-sound system to collect, reuse, and recycle or dispose of products at the end of their lives."

We believe there are a number of very persuasive reasons to recycle and reuse electronic products regardless of whether landfills are effective in controlling the release of heavy metals. The environmental advantages of electronics reuse and recycling are described in detail in the recently issued SWANA Training Manual on Establishing an Electronics Recycling Program and are summarized below.

First of all, recycling saves energy because producing products from recycled materials consumes much less energy than from virgin raw materials. Reuse of products conserves the energy used in product manufacture. Therefore, recycling and reuse can significantly reduce the consumption of energy from nonrenewable fossil fuels such as coal, imported oil and natural gas and significantly reduce the environmental emissions from energy production, including greenhouse gasses and mercury.





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Recycling and reuse also avoid the adverse environmental impacts of mining, harvesting and processing virgin raw materials, including the impacts of soil erosion, habitat destruction and the adverse effects on water and air resources. In the case of used electronics, reuse and recycling would avoid oil production for the plastics and would avoid precious metal mining for the circuit boards and other components.

Thirdly, many electronic products fail the Toxic Characteristic Leaching Procedure (TCLP), and would be required to be handled as hazardous waste under federal law if they were discarded by commercial or industrial generators. Disposal of such products in MSW landfills would be a violation of federal regulations and could subject the generator, transporter and landfill operator to civil and criminal enforcement actions.

Finally reuse and recycling can reduce the need for and the costs of long term monitoring and care of landfills, including the potentially very high costs of future corrective action, if necessary. These costs can continue for decades after a landfill closes and would fall on future generations.

SWANA certainly stands behind the conclusions of our Applied Research Foundation report that MSW landfills can provide for safe disposal of products containing heavy metals without exceeding limits that have been established to protect human health and the environment. However, that does not mean that landfill is the preferred waste management strategy for such products. SWANA supports as a first priority practices that reduce the quantity of solid waste and recycle and recover value from waste. Recycling and reuse of electronic products would produce many benefits from a resource use and environmental perspective. Efforts that involve manufacturers, retailers and designers in programs to collect, reuse, and recycle electronic products are fully consistent with SWANA's Product Stewardship Policy.

Sincerely yours,

John H. Skinner, Ph.D.
Executive Director and CEO

