



Advancing Carpet Stewardship: A How-To Guide

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WHAT IS CARPET STEWARDSHIP?

Americans discard nearly 3.9 million tons of carpet and rugs annually. Yet, despite voluntary industry recycling programs, only about 7.5 percent gets recycled. Much of this bulky, cumbersome waste ends up in the nation's landfills and imposes significant costs on local governments for its management. Reusing and recycling, rather than landfilling, scrap carpet can:

- Reduce reliance on disposal;
- Recover valuable materials to make other products (including decking, construction material, automotive and furniture parts, and carpet pad, among others);
- Create recycling jobs;
- Reduce waste management costs for governments;
- Reduce the need for virgin materials to be extracted; and
- Reduce greenhouse gas emissions and energy use by decreasing the energy-intensive production of new carpet.

State and local governments, carpet manufacturers, and other stakeholders in the carpet life cycle need to work together to develop more effective ways of managing scrap carpet. Carpet stewardship is a way to minimize the health, safety, and environmental impacts of carpet from manufacturing through end-of-life, while also maximizing economic benefits. Carpet manufacturers have the greatest ability to increase sustainable production and recycling, but other stakeholders, such as suppliers, retailers, and consumers, also play a role. Carpet stewardship can be either voluntary or required by law.

Extended producer responsibility (EPR) is a mandatory type of product stewardship that includes, at a minimum, the requirement that the manufacturer's responsibility for its product extends to managing that product at end-of-life, including both financial and management responsibility. EPR laws have the capacity to spur substantial increases in recycling rates, particularly when legislation includes performance goals and/or collection site convenience metrics. This is especially significant in the case of carpet, which has maintained a low recycling rate despite voluntary efforts. However, even in the absence of EPR laws, there are non-regulatory (e.g., market development) and regulatory actions (e.g., disposal bans) that can be taken to both improve carpet collection and recycling, and lay the groundwork for future EPR programs.





WHY DO YOU NEED THIS GUIDE?

This HOW-TO GUIDE has been written to provide fundamental guidance and map out best practice strategies for setting up effective carpet stewardship programs. Its primary audience is state and local governments who play a role in setting policies, purchasing carpet, and collecting scrap carpet. This guide outlines several actions government representatives can take to advance carpet stewardship, whether through legislated or voluntary programs.

This document will also be valuable for other stakeholders in the carpet life cycle, such as manufacturers, major institutional and commercial buyers of carpet (e.g., commercial building owners and property management companies), construction and demolition (C&D) businesses, residential consumers and retailers, carpet dealers and installers, transporters, scrap carpet processors/recyclers, and environmental groups. Like government officials, these other stakeholders also have a responsibility — and with EPR laws, a legal obligation—to reduce the burden of scrap carpet on the communities they serve and live in.

The purpose of this document is to provide tools that can:

- Lay the groundwork for EPR legislation for carpet;
- Detail the components and benefits of an effective EPR program; and
- Provide insights into the challenges, potential solutions, and important considerations in carpet stewardship, even in the absence of a legislated EPR program.

This guide will also specifically provide information on how to spread awareness of the problem posed by scrap carpet, improve the recyclability of scrap carpet, and develop solutions to increase scrap carpet recovery. It also includes suggestions to address the unique challenges of rural communities. To assist government officials and others to increase carpet recycling, the guide dives into the following HOW-TOs:

- ***HOW-TO Ramp Up Outreach and Education***
- ***HOW-TO Establish Best Practice Collection and Storage***
- ***HOW-TO Foster Markets that Care about Carpet Stewardship***
- ***HOW-TO Meet the Challenges that Stewardship Programs Face in Rural Areas***
- ***HOW-TO Understand the Effects of EPR Laws on Your Programs***

For more information on advancing carpet stewardship, see the PowerPoint presentation and audio recording from PSI's webinar on *Carpet & Mattress Stewardship in Rural Areas*, or visit the [carpet stewardship page](#) on PSI's website.



HOW-TO #1: *Ramping up Outreach*

KEY MESSAGES:

Outreach and education are essential parts of any carpet stewardship effort because they provide the means to communicate the importance of recycling scrap carpet and supply key information on where and how to recycle. Educational efforts also increase awareness and use of best practices in collection, storage, and handling to maintain the quality and condition of scrap carpet materials for recyclability and reuse. Outreach and education should be targeted toward residents, commercial building owners, carpet installers, construction and demolition businesses, property management companies, retailers, commercial dealers, trade associations, transporters, processors/recyclers, and regulators. Each of these groups is important because of their role in generating and handling scrap carpet, as well as in communicating with key stakeholders as the material makes its way from removal to collection to processing and recycling. To the right, you will find key messages that officials must communicate and suggested ways to get the word out.

KEY MESSAGE: *Carpet needs to be recycled.*

Unlike bottles, cans, or plastic, carpet is not a material that people recycle every day or even every year. A significant challenge, therefore, is simply trying to get the public to consider what happens to their carpet after they discard it. Carpet is bulky and takes up significant space in landfills. It can even cause problems with landfill machinery. Thus, one of government's challenges is to get scrap carpet generators (including residents and businesses) to recognize carpet as an item that can be, and should be, recycled.

KEY MESSAGE: *There are recommended ways to collect, store, and handle carpet so that it is suitable to recycle and for reuse.*

While recyclers know how carpet must be stored and handled to make recycling an option, many scrap carpet generators may not. For carpet stewardship programs to be successful, it is important to publicize best practice methods of removal, collection, storage, and handling to major consumers of carpets, including commercial and institutional purchasers (such as hotels, apartment buildings, office buildings, schools, and government agencies); carpet dealerships and carpet installation companies; and homeowners.

Emphasis should be placed on the need to protect carpet with plastic sheeting, plywood, or drop cloths to keep it clean, dry, and free of debris (e.g., tack strips, nails, paint, and drywall mud). Carpet tack strips and nails will damage recycling equipment. In addition, carpet should be prevented from becoming contaminated with bodily fluids, chemicals, or asbestos.

KEY MESSAGE: *There are convenient ways to get scrap carpet into recycling streams.*

A significant challenge in any recycling program is educating the public about where and how to bring products in for recycling, or whether collection options are available. With carpet, this is particularly significant because of the bulky nature of the product and the inconvenience recycling poses to most scrap carpet generators.



RECOMMENDED STRATEGIES:

STRATEGY: *Don't Go it Alone—Collaborate*

Each stakeholder group along the carpet life cycle brings a different perspective to the task of recycling carpet. From the outset of any effort to create and run a carpet stewardship program, steps should be taken to collaborate with these groups. Collaborative outreach creates a basis for future communication between stakeholder groups, and may highlight new opportunities to improve collection infrastructure, determine markets for materials, and provide recycling services.

Options to consider:

- Develop education and outreach materials in collaboration with trade associations (including those for architects and interior designers as well as the more obvious ones for dealers or manufacturers), dealers and installers, recyclers, state/local procurement bodies, and regulators.
- Use these stakeholders' websites and newsletters to reach out to their members and networks.
- Suggest carpet stewardship or carpet recycling as possible topics for any public service announcement programs run by stakeholders.
- Seek out opportunities for coordination and collaboration on education and promotion with other stewardship programs in your community or state (e.g., paint or mattresses) and carpet recovery efforts in other communities or states. This can include sharing lessons learned and best practices, and cross-promoting stewardship efforts.

STRATEGY: *Innovate—Use a Variety of Media*

Reach out to a wide range of audiences on an ongoing basis by relying on diverse media in education and outreach initiatives, including targeted emails, mobile texting, website content, news media, social media, events, and printed materials that can be distributed during in-person meetings, trade shows, and waste collection events. Trade press and trade shows may be a particularly valuable way to reach building owners, carpet installation contractors, and retailers. Take advantage of environmental fairs or events as well as planning an annual effort around Earth Day when media will be open to doing recycling stories.

STRATEGY: *Don't Re-Invent the Wheel—Create Outreach Materials with Other Carpet Recycling Groups*

Work to create regional umbrella groups that can produce and share expenses for educational and outreach campaigns. This will be especially helpful for smaller local government agencies, but is an efficient approach for any organization. Pooling resources can increase the efficiency and reach of each initiative; for example, communities might collaborate to write one version of best practices for collection and storage that can be easily customized and used by several communities.

STRATEGY: *Connect with Local Environmental Groups*

Many environmental groups readily support recycling programs, and will stand behind legitimate efforts to increase scrap carpet recycling. Reach out to them to endorse and promote your efforts.



HOW-TO #2: *Establishing Best Practices*

RECOMMENDED STRATEGIES:

Approaches to collection and storage are critical to the recycling and reuse of post-consumer carpet. Convenient collection makes it more likely that scrap carpet generators will deliver discarded materials to appropriate locations rather than resort to illegal dumping or bulk waste pickup for landfilling. However, it is not just getting scrap carpet to collection sites or recyclers that is important. For programs to successfully increase recycling, they must also protect against carpet contamination from such items as water, paint, chemicals, and debris, which makes materials unsuitable for reuse or recycling.

To be successful, carpet stewardship programs must work to provide multiple collection sites that are convenient in terms of both location and hours of operation. They must also work to maintain relationships with recyclers and recycling centers to ensure reliable service for their areas of operation.

STRATEGY: *Develop New Collection Systems*

Evaluate strengths and weaknesses of any existing collection systems, and consider new opportunities. Work with retailers, distributors, and installers to explore the opportunities and challenges of “reverse distribution” systems, which use the same infrastructure to return scrap carpet to the original manufacturer or seller. Retailers, in particular, are well positioned to provide collection services, and state and local governments can work to foster the development of this mode of collection through pilot programs, policy statements, and regulatory requirements.

The key to collection is making it convenient. Convenience almost always necessitates having more than one site, and for sites to be open multiple days and at a variety of times. Encourage development of convenient collection sites, such as local solid waste facilities, construction and demolition sites, and/or retailers. Providing multiple channels for scrap carpet, including permanent drop-off sites, retail take-back, one-day collection events, and even curbside collection—if clear instructions are provided to protect the carpet quality—may further increase access to recycling outlets and the supply of usable scrap carpet.

STRATEGY: *Educate on the Reasons Why Carpet Quality Has to Be Preserved*

To increase the flow of material suitable for recycling and reuse, collectors must provide scrap carpet to processors in a condition suitable for recycling. Therefore, one of the first steps carpet stewardship programs should take is learning the product specifications for scrap carpet of all nearby recycling facilities. This information also needs to be disseminated to generators as part of initial education and outreach efforts. Those involved with carpet stewardship programs should also make an effort to become familiar with multiple nearby recycling markets and facilities, in the event that a nearby facility closes unexpectedly or can no longer accept material.



Practice Collection & Storage



STRATEGY: Select Best Practices for Collection & Storage

Effective collection and storage systems can increase carpet recovery and ensure worker safety. Introduce facility policies, employee training protocols, and signage that promote the following best practices:

1. Segregate scrap carpet from other materials. This will make the process more efficient and prevent cross-contamination of materials. Once segregated, carpet can then be separated into three streams:
 - Carpet in very good condition that could be reused;
 - Carpet that could be recycled; and
 - Carpet that is stained or contaminated (separating this material can minimize health risks to employees).
2. Roll carpet and pad separately and stack no higher than 10 feet, with all rolls facing the same direction.
3. Store materials under cover and off the ground to prevent contamination and damage from water or dirt. If storage is outdoors, use closed containers to mitigate issues of storm-water runoff, fire hazards, and mold, and limit storage time to prevent product degradation, reduce water contamination, and avoid odors and mold.
4. Reduce risk of asbestos exposure. Even though carpet does not normally contain asbestos, it can become contaminated in the process of removal and subsequent handling. Communicate with generators regarding collection practices to ensure carpet is free of asbestos.
5. Develop a contingency plan for instances when it is necessary to store more material than is typical at the collection site.

Below are resources that provide further guidance on best practices for collection and storage:

- *2011 Carpet Removal Best Practices for Carpet Recycling: For Use by Flooring Professionals Wanting to Recycle Used Carpet in Washington State*
- *Carpet Removal Best Practices for Carpet Recycling Field Guide: For Preparing Carpet for Recycling in Washington State*

- *CARE Post-Consumer Carpet Receiving Requirements*
- *CARE Storage Guidelines and Post-Consumer Carpet*
- *CalRecycle – Carpet Materials Management.*

STRATEGY: Pay Attention to Details in Contracts with Transporters and Processors

It is important to consider specific elements of contracts with transporters and processors who take material from your collection site to ensure that scrap carpet:

- Will be accepted for recycling;
- Is being managed appropriately by contractors; and
- Is recycled to the greatest extent possible.

Learn the requirements of potential transporters and processors. These can affect procedures at your site. For instance, do they accept carpet pads? Will they take scrap carpet that is loose as opposed to bagged? What happens if asbestos is found? What are the requirements for documentation?

Include provisions in your contracts with haulers and processors who remove and process scrap carpet from your site that:

- Certify that material will be recycled to the greatest extent possible;
- Ensure transporters and processing facilities are in compliance with all legal requirements;
- Ensure that a manifest system is in place with return documentation to be sent to you as the collector;
- Provide for periodic reporting and access to facility and include inspection protocols;
- Allow for changes in the contract over time due to such circumstances as market fluctuations; and
- Help incorporate haulers in the customer education and outreach process.

For further details on contracts, see the *Joint Advisory on Designing Contracts for Processing of Municipal Recyclables* developed by the Solid Waste Association of North America, and the National Waste and Recycling Association.

HOW-TO #3: *Fostering Markets that*

RECOMMENDED STRATEGIES:

Expanding scrap carpet recycling markets requires identification of the product scope (e.g., carpet, carpet pad, carpet tiles, etc.), a sense of the process from collection to recycling, and knowledge of the potential end products made from recycled carpet. Carpet is composed of face fiber, backing, and adhesive. Face fiber can include Nylon 6, Nylon 6.6, polypropylene, polyethylene terephthalate (PET), polytrimethylene terephthalate (PTT), and approximately five percent other material (such as acrylic, wool, or cotton). While Nylon 6 and Nylon 6.6 are easily recycled, there is currently insufficient recycling market demand for the increasing supply of PET and PTT fibers. Collection, handling, and processing costs generally exceed the market value of reclaimed material, especially PET-containing carpet. At the processor/recycler, fiber types are identified, the scrap carpet is turned into a low-value commodity or a value-added product, and then the commodity or product is transported to manufacturing facilities. Manufacturers use the material to produce decking, construction materials, tile backer board, railroad ties, automotive and furniture parts, carpet cushion, and other products.

The market for scrap carpet reuse and recycling is often based on where different types of processing facilities are located and the specific carpet material composition and design. For example, with broadloom carpet, the desired material for recycling is the face fiber, whereas for carpet tile, the desired material is the backing. Markets for PET carpet are significantly weaker than those for nylon carpet, which often creates economic and operational difficulties for recyclers and waste management agencies. Taking action to foster, maintain, and enhance markets for scrap carpet is key to advancing carpet stewardship.

STRATEGY: *Take Action to Directly Encourage Market Development*

- Revisit contract provisions for procurement and services, and implement procurement requirements that encourage use of post-consumer carpet content materials in procurement and service contracts.
 - Require, in contracts, that new carpets have post-consumer recycled content, are readily recyclable, and manufacturers or suppliers will reclaim the product after its use.
 - Ask for, and review, *Environmental Product Declarations* that are independently verified and provide comparable information about life cycle impacts.
 - Purchase products with *NSF/ANSI 140* (Sustainable Assessment for Carpet) certification to the platinum level (ensures 10 percent post-consumer content), and verify that the post-consumer content is recyclable. The Carpet and Rug Institute provides a list of *Carpet Products Certified to NSF/ANSI 140* (also check for actual certifications from manufacturers).
 - Develop standards and specifications that advance environmentally preferable purchasing.
 - Encourage carpet manufacturers to use post-consumer carpet content in their own products. A bill introduced in 2015 in Illinois (*HB 1429*) provides an example of legislative language requiring procurement of recycled materials.
- Provide grant funding for market development at the state and local level. Although sustainable program funding for market development should come from manufacturers, a government agency can jump start carpet recycling by providing grant funding to stimulate initial market development.



Take Care About Carpet Stewardship

STRATEGY: Adopt Policies and Undertake Projects to Encourage Recycling

Possibilities include:

- Identify, assess, and select potential markets for carpet recycling.
- Ban disposal of all scrap carpet in landfills or at waste-to-energy facilities, and make scrap carpet recycling mandatory. (For general disposal ban examples, see *Seattle Ordinance 124076*; Connecticut Department of Energy and Environmental Protection *Designated Recycling Regulation, Section 22a-241b*; Massachusetts Department of Environmental Protection *Regulations 310 CMR 19.017*; Minnesota Statutes *115A.945*). Bans and recycling mandates must recognize the need to have a plan and infrastructure in place. For example, a two-year implementation time frame might be provided after a ban is enacted to allow time for investment in collection and processing infrastructure. In addition, bans or recycling mandates must consider key related issues such as lack of markets for certain materials (e.g., recovered calcium carbonate and PET carpet).
- Require those who obtain permits and licenses to conduct construction, renovation, and demolition projects to collect and recycle carpets, and submit waste diversion reports.
- Require those that illegally dump carpets to pay for cleanup.
- Require retailers and haulers to report on collection activity (e.g., quantity of carpet collected, recycled, and otherwise disposed).
- Strengthen local building and solid waste codes to require waste diversion.
- Ensure local construction and demolition programs provide separate covered containers for carpet to keep it clean.
- Provide financial incentives (e.g., a payment or tax rebate) to those recovering scrap carpet.
- Require the purchase of recycled content products, including carpet-derived products, to better ensure there are outlets for processed carpet materials.



STRATEGY: Specifically Include Carpet in Local Recycling Policies

- For haulers (those transporting to a transfer station or landfill), see the Solid Waste Association of North America and National Waste and Recycling Association's *Joint Advisory on Designing Contracts for Processing of Municipal Recyclables* for options on requirements (e.g., reduced fee on source separated recyclables, diversion plan, specify materials that must be recycled).
- For commercial installers, C&D businesses, property management companies, and small businesses that serve public agencies, require removed carpet to be recycled to the greatest extent practical, and that these entities support market development for recycled-content products through their procurement policies.

STRATEGY: Identify and Evaluate Funding Needs and Options, Including Economics of Recycling versus Disposal, and EPR

STRATEGY: Establish a Statewide Group with Key Stakeholders that Meet Regularly on the Issue of Carpet Stewardship and Market Development

HOW-TO #4: *Meeting the Challenges the*

RECOMMENDED STRATEGIES:

While carpet stewardship can face hurdles in any jurisdiction, rural communities face unique challenges. Rural communities tend to be more geographically dispersed, with smaller populations than urban communities. This means that rural collection and transportation costs will typically run higher than in more densely populated areas due to smaller volumes available for collection and longer transport distances. In some cases, it may take many months to collect enough material to justify the need for transportation to a processor. As a result, it is less cost-effective for recyclers and transporters, and they may be less inclined to provide services needed for recycling.

STRATEGY: *In Numbers and Collaboration, There is Strength—and Economy*

In almost all aspects of running a carpet stewardship program, rural areas can benefit from collaboration with other rural areas facing similar hurdles. Work closely with service providers and surrounding communities to establish collection sites and increase economies of scale in collection and transportation to a processor. Identify landfills or transfer stations that can serve as consolidation points for a regional area. By doing so, rural communities can share costs and pool their collections to make pickups by recyclers more economical. Costs can also be shared for other activities, such as education and outreach. Larger, consolidated operations also bring with them the potential for more jobs and more capacity to seek out grant support.

This approach has been tried successfully in an EPR pilot program serving rural areas in California. The pilot started in 2012 with six counties, who were issued trailers to store scrap carpet until a service provider could pick them up. As a result of the success of this pilot, the program was expanded to a total of eleven participating counties, and, in 2014, over 560,000 pounds of scrap carpet were collected for recycling.

STRATEGY: *Commit to Best Practices for Storage*

Rural local governments should find a way to store scrap carpet until they have a large enough volume to make it worth the cost of transportation. This may require storing materials for a significant length of time. Following collection and storage best practices is, therefore, particularly important in maintaining the quality of materials so that they are acceptable for recycling.

For more information on carpet stewardship in rural areas, see the PowerPoint presentation and audio recording from PSI's webinar on *Carpet & Mattress Stewardship in Rural Areas*.

STRATEGY: *Try it Out*

In general, rural local governments can use pilot projects to figure out which collection and storage methods will work best in their communities, including implementing retail collection sites or establishing transfer station "hubs" to service multiple communities.



at Stewardship Programs Face in Rural Areas



HOW-TO #5: *Understanding the Eff*

Carpet Stewardship in the U.S.: Key Background

In 2002, state and local government agencies, carpet manufacturers, waste managers, and the U.S. Environmental Protection Agency (EPA) convened to develop a sustainable solution for scrap carpet. These parties signed a Memorandum of Understanding (MOU) which launched an industry-run product stewardship program for carpet, targeted at reaching 40 percent diversion and 20 to 25 percent recycling by 2012. Unfortunately, in 2010, the industry was far from reaching that goal, with only a 4.5 percent recycling rate. The second round of MOU negotiations concluded in 2011, when the multi-stakeholder group could not reach agreement in key areas, including future national goals and identification of a sustainable funding mechanism.

California Carpet EPR Program

Currently, California is the only state in the U.S. with a carpet EPR law in place. Established in 2011, this is a carpet manufacturer-designed and managed incentive program, whereby recycling processors are paid a subsidy for the material they sell to be used in new products. Consumers pay a small assessment (currently \$0.10 per square yard) on the purchase of new carpet which is used by manufacturers to fund program activities. The program is designed to make recycling economically viable in the state. It does not, however, directly pay for the costs to collect, transport, and recycle scrap carpet.

While this program spurred an initial increase in the recycling rate, *Carpet America Recovery Effort* (CARE), the stewardship organization established by carpet manufacturers which operates both the mandatory California program and a national voluntary program, has not been able to achieve continuous and meaningful improvement as required by the California law. Consequently, CARE has made adjustments to the incentives it offers to address changing market conditions for the materials processed.



In addition to the statewide program, the California Carpet Stewardship Program has a Rural Counties Program that started as a pilot and is gradually being introduced into rural counties. In this rural program, CARE works with each county to determine where collection trailers should be located. CARE then provides the collection trailers, and covers the cost of transporting the trailers to a carpet processor. CARE also provides outreach and education materials customized for each rural county.

While California's carpet EPR law has resulted in recycling rates of up to 14 percent, double that resulting from voluntary programs, this law does not align with many aspects that would be considered part of a model EPR program advocated by government agencies around the country. For example, its stated goal of continuous and meaningful improvement is vague relative to the performance or convenience requirements that would be included in model legislation. The law has, however, provided sufficient flexibility for CARE to respond to challenging market conditions.

Effects of EPR Laws on Your Programs

CARE Voluntary Product Stewardship Program

In addition to operating California's carpet stewardship program, CARE launched a nationwide temporary *Voluntary Product Stewardship Program* in 2014, designed to provide an alternative to EPR programs. As part of this program, CARE has, for a limited time, offered to provide funds to carpet sorters to increase the volume of post-consumer carpet diverted from the landfill. Sorters are not eligible to receive funds if they collect or sort carpet in states or local municipalities that have carpet EPR legislation or regulations. They are also not allowed to support the development of EPR legislation.



HOW-TO #5: *Understanding the Eff*

Key Differences between a Model EPR Program and Voluntary Programs

The following table is a comparison between a model EPR program and voluntary programs. The information listed for the model EPR program provides a concise view of certain key elements of EPR legislation that, together, aim to most closely meet the fundamental *principles of EPR*. Existing EPR laws for different products meet this model to varying degrees.

	Model EPR Program	Voluntary Programs
<i>Financing of End-of-Life Product Management</i>	<ul style="list-style-type: none"> Manufacturers pay for collection containers, transportation to processors, and recycling and disposal costs. To fund programs, manufacturers <ul style="list-style-type: none"> charge an “eco-fee” at retail, for consumer purchase of a new product; or incorporate a charge into the product price (cost internalization). 	<ul style="list-style-type: none"> Product generators (e.g., residents, contractors, etc.), and/or state/local governments typically pay for the cost of collection, transportation, processing, recycling, and disposal.
<i>Program Management</i>	<ul style="list-style-type: none"> As a condition of sale, manufacturers are responsible for managing programs to recycle and dispose of their products at end-of-life. 	<ul style="list-style-type: none"> State and local governments, non-government generators, and industry voluntary programs (when available) are typically responsible for end-of-life product management.
<i>Education and Outreach for Collection and Recycling Programs</i>	<ul style="list-style-type: none"> Manufacturers are responsible for paying for and implementing education and outreach programs. 	<ul style="list-style-type: none"> State and local governments, and industry voluntary programs (when available) typically provide education and outreach.
<i>Collection/ Processing Infrastructure</i>	<ul style="list-style-type: none"> Consumers have convenient access to collection opportunities free of charge. Programs often integrate existing collection and processing infrastructure with new facilities responding to new opportunity. 	<ul style="list-style-type: none"> Consumers often do not have convenient access to collection sites, and at times pay a fee at the collection site.
<i>Resource Conservation Hierarchy</i>	<ul style="list-style-type: none"> Manufacturer-managed programs must follow the resource conservation hierarchy of reduce, reuse, recycle, and beneficial use, to the extent economically practical and technically feasible. 	<ul style="list-style-type: none"> Greater reliance on disposal in landfills and at waste-to-energy facilities due to economics that favor these options over higher and better uses such as reuse or recycling.
<i>Performance</i>	<ul style="list-style-type: none"> Manufacturers are responsible for achieving performance goals (e.g., state-wide convenient access to collection sites, recycling standards) established or approved by government. 	<ul style="list-style-type: none"> Requirements for collection convenience or recycling goals may or may not exist.



Effects of EPR Laws on Your Programs

EPR legislation is often more effective than voluntary initiatives in terms of:

- Reducing reliance on disposal in landfills and at waste-to-energy facilities.
- Reducing dependence on fossil fuels.
- Accelerating the creation of recycling jobs.
- Expanding opportunities for carpet collection and recycling. EPR contributes to carpet recycling infrastructure by incentivizing the following:
 - Development of infrastructure to increase collection, reuse, and recycling. Under EPR legislation, manufacturers are often required to meet standards for convenience and/or collection volumes. To meet these goals, it is often necessary for manufacturers to expand collection infrastructure.
 - Market growth of new products made with recycled content. EPR guarantees a larger and more continuous flow of materials for recycling than disposal in landfills or at waste-to-energy facilities, which creates new opportunities for recycling market growth.

Further description of elements of a model EPR bill for carpet can be found in PSI's *Carpet Stewardship Briefing Document*. This document also contains information regarding key issues in carpet stewardship and potential solutions. The *2014 Carpet Stewardship Dialogue Meeting Summary* from PSI's carpet stakeholder dialogue meeting is an additional resource for information on carpet stewardship stakeholder perspectives, key issues and potential solutions, as well as model EPR bill elements.





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