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July 20, 2020

Hon. Christopher C. Krebs
Director
Cybersecurity and Infrastructure Security Agency
Department of Homeland Security
245 Murray Lane
Washington, D.C. 20528-0380

Dear Director Krebs,

The National Waste & Recycling Association (NWRA) is the voice in the nation's capital for the private-sector waste and recycling industry, which has been essential during our national response to COVID-19 in preventing the spread of disease and illness as well as maintaining the quality of American life. The delivery of waste and recycling collection and processing services impacts all healthcare, residential, commercial, and industrial properties on a daily basis.

During this national emergency, NWRA members have been classified as "essential" and are listed under five different "Essential Critical Infrastructure Workers" headings in the CISA 3.1 guidelines - "Public Works and Infrastructure Support Services," "Critical Manufacturing," "Hazardous Materials," "Healthcare / Public Health," and "Transportation and Logistics."

Despite being listed in five separate essential categories by CISA, the waste and recycling industry was left out of FEMA's initial direct to industry distribution of 6.5 million non-medical grade cloth face masks in late-April, even though two of these five categories were specifically singled out to receive distributions in a detailed memo. We believe that the lack of consolidation of the industry's classification was in fact a disadvantage that led to this troubling oversight.

NWRA requests that the industry's listing in five separate headings be consolidated in the next guidelines revision under a single "Waste and Recycling Collection Services and Processing" Essential Critical Infrastructure Workers category. As other emergencies or natural disasters such as hurricanes occur, a clear designation for the waste and recycling industry will be crucial to ensuring continuity of operations.

The solid waste industry directly employs nearly 450,000 people as of mid-2020. It is estimated that the private sector waste and recycling industry accounts for over one million jobs. Association members operate in all 50 states and the District of Columbia and can be found in most, if not all, U.S. congressional districts. Waste and recycling facilities number nearly 18,000 scattered throughout the U.S., mirroring population centers.

Thank you for taking the time to review this request. Please ask the appropriate staff member in your office to contact Jim Riley at 202-364-3744 or jriley@wasterecycling.org to discuss this issue or if you need additional information. We look forward to working with you and your staff in developing this critical new designation.

Sincerely,

A handwritten signature in cursive script that reads "Darrell K. Smith".

Darrell K. Smith, PhD
President and CEO

cc: The Honorable Peter T. Gaynor, FEMA Administrator