

February 4, 2026

The Honorable Howard Lutnick
Secretary of Commerce
U.S. Department of Commerce
1401 Constitution Ave NW
Washington, D.C. 20230

**RE: Recommendations from the Environmental Technologies Trade Advisory Committee
on Supporting U.S. Manufacturers of Recycled Plastic**

ETTAC Recommendation 2026-8

Dear Mr. Secretary,

The Environmental Technologies Trade Advisory Committee (ETTAC) is a statutorily established committee whose purpose is to advise on the policies and procedures of the U.S. government that affect exports of U.S.-made environmental technology, goods, and services. In this capacity, the ETTAC is providing the following recommendations to strengthen U.S. leadership and competitiveness by supporting U.S. domestic suppliers of recycled content materials that are essential to the success of the U.S. recycling industry. A strong domestic recycling industry not only meets U.S. demand but also positions the U.S. as a global leader in exporting high-quality recycled materials and technology.

The ETTAC is deeply concerned about the immediate and severe impact of imported questionable post-consumer recycled content materials on American jobs and companies. Facility closures and job losses are mounting as U.S. manufacturers struggle to compete with cheaper, non-verified imports. This situation demands urgent action to protect American workers and restore fair competition.

Background

The U.S. post-consumer recycled plastic manufacturing sector is struggling due to imports of cheaper, imported materials purporting to be recycled plastics. Available market information indicates significant volumes originating from Taiwan and possibly China, with concerns raised regarding transshipment, misclassification, and traceability of claimed recycled content. The shift to questionable recycled plastic is driving facility closures, job losses, and the disruption of a once-promising American recycling industry. ETTAC requests support from the government to mitigate this threat to the recycling industry and to safeguard the domestic capacity that underpins U.S. environmental technology exports.

A healthy domestic recycling system depends on a balance of supply and demand in recycled material. A sufficient and consistent supply of materials needs to be collected and processed for end markets to invest and scale their operations to utilize the supply of materials created. This entire ecosystem requires market-based pricing and a consistent supply of material. This delicate balance is severely disrupted when cheaper and non-verified “recycled content” is imported to

achieve mandated recycled content goals, causing closures of U.S. recycled polyethylene terephthalate (rPET) facilities.^{i,ii}

Recommendations

We urge the Department of Commerce to investigate and address unfair trade practices, including dumping of dubious recycled materials. Investigations, targeted remedies and enforcement are needed to ensure American companies can compete on a level playing field and maintain domestic capacity.

Investigate the Possibility of Unfair Trade Practices Regarding Imports of rPET/PET

The amount of rPET/PET imports has steadily increased over the past several years.ⁱⁱⁱ Taiwan exports the largest amount of rPET/PET to the U.S. This material is being used to achieve the mandates of several recycled content laws that were passed on the west coast to help bolster the domestic recycling industry. Given current U.S.–Taiwan trade negotiations, ETTAC recommends engaging Taiwan directly to improve verification standards, prevent transshipment, and ensure accurate classification of rPET/PET exports destined for the United States. The Department of Commerce could also consider self-initiating a trade remedies investigation into imports of rPET/PET from certain countries. Alternatively, the Office of the U.S. Trade Representative could consider an investigation under Section 301 of the Trade Act of 1974 into the acts, policies, and practices related to rPET/PET exports from certain countries. Lastly, the ETTAC recommends that U.S. Customs and Border Protection be requested to prioritize enforcement against misclassification and to require documentation sufficient to verify recycled content claims (e.g., certification, chain-of-custody, and source transparency), particularly for food-grade applications. There is doubt as to whether this imported material is actual recycled content and thus whether imports into the United States are properly classified.

When legislation was considered that would require beverage manufacturers to report country of origin for postconsumer recycled plastic, opponents argued stating that “manufacturers procure bottles from various suppliers, who source rPET from numerous suppliers...[who] do not have this information.” This seems to suggest that bottle manufacturers cannot verify the safety of the materials that must be food grade quality.

Use Targeted Trade Remedies for rPET/PET

The ETTAC supports free and fair trade on market-based terms; however, when imported products benefit from unfair trade practices and product misclassification that may constitute customs fraud and mischaracterize materials for environmental benefits, corrective measures are necessary to maintain a level playing field. To address these distortions, targeted remedies, such as antidumping and countervailing duties (AD/CVD) measures, enhanced customs enforcement, and Section 301 actions, are warranted.

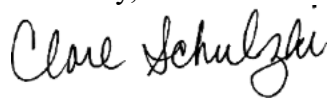
Advocate for a Unified Approach

The ETTAC strongly encourages collaboration with policymakers, industry leaders, and environmental organizations in addressing these key areas. By encouraging dialogue and establishing actionable goals, the Department can create a unified pathway toward a long-term, secure future for the U.S. recycling industry.

Conclusion

We appreciate your consideration of these recommendations for bolstering the United States' domestic recycling and protecting American jobs and companies. We look forward to working with you to support their implementation and the growth of the U.S. environmental technology industry exports. We welcome the opportunity to further discuss these issues.

Sincerely,



Clare Schulzki
ETTAC Chair

Cc: The Honorable Jamieson Greer, U.S. Trade Representative
The Honorable Marco Rubio, Secretary of State

ⁱ [rPlanet Earth closes its doors - Recycling Today](#)

ⁱⁱ [Alpek closing North Carolina PET plant](#)

ⁱⁱⁱ [INSIGHT: Future US R-PET imports in question after disappointing summer, added reciprocal tariff cost](#)