



June 27, 2005

U.S. Department of Defense- Submitted via internet
DFAR Case 2004-D011

Re: Defense Federal Acquisition Regulation Supplement; Radio Frequency Identification

Dear Sir or Madam:

The Solid Waste Association of North America (SWANA) is pleased to offer the following comments in response to the above-referenced U.S. Department of Defense (DOD) modification of the Defense Federal Regulation Supplement (DFARS). SWANA is a not-for-profit association comprised of over 7,300 solid waste professionals that are representative of local governments and private companies across the U.S. and Canada. SWANA is involved in all aspects of responsible municipal solid waste (MSW) management practices. SWANA has an interest in this proceeding as the Association represents a broad cross-section of public and private MSW recycling owners/operators which provide services to numerous cities and communities across the country.

This comment is in response to questions four and five in Federal Register posting on April 21 in which DOD requests information on the impacts of passive radio frequency identification (RFID) tags on recycling on corrugated, metal, and plastic shipping containers. SWANA would like to present its opposition on requiring contractors to affix RFID tags at the case and palletized unit load levels when shipping certain purchased supplies and equipment until further information presents itself; outlining the full economic and environmental impacts of RFID tags on the recycling industry. Despite considerable efforts to come up with information on this subject, SWANA has been unable to do so thus far. Moreover, no recycling organizations or government agencies have been able to provide such information. In the absence of greater certainty about the impact of such a policy, SWANA strongly recommends that the Department of Defense proceed cautiously.

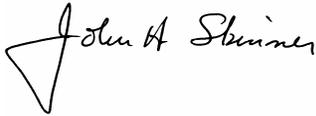
The RFID tags may have the potential to contaminate large quantities of currently recyclable material due to its heavy metals content. Moreover, small chips or pieces of metal slipping through the screening process during the cleaning and screening process could be a potential problem for paperboard packaging that comes into contact with food or pharmaceuticals. Metals are prohibited in paperboard that will come into contact with food or pharmaceuticals. Additional concerns are that metals in the RFID tags that would be contaminants in the steel-making process, such as copper, could end up going up the stack as air emissions or stay in

the product. The metals constituents of the RFID tags will be contaminants for PET, HDPE, and especially glass when concentrated.

The DOD should either fund studies or seek partnerships with other federal agencies with knowledge of the recycling industry to determine the financial impacts of this decision on the recycling industry and whether making this policy change would make sense from an environmental standpoint before making any final decision.

Thank you in advance for consideration of our views. We look forward to working with DOD on this very important issue.

Respectfully submitted,

A handwritten signature in black ink that reads "John H. Skinner". The signature is written in a cursive style with a large, stylized initial "J".

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