



January 21, 2026

Via email: [DNRECHearingComments@delaware.gov](mailto:DNRECHearingComments@delaware.gov)

Theresa Smith, Hearing Officer  
DNREC – Office of the Secretary  
89 Kings Highway  
Dover, DE 19901

Re: Proposed Amendments to 7 DE Admin. Code: 1301, “Regulations Governing Solid Waste” (Docket #2025-R-WHS-0016)

NWRA is the leading voice for the waste and recycling industry in the United States. NWRA represents private sector companies that collect, process, and manage waste and recycling for millions of American homes and businesses. Our members are committed to advancing safe, efficient, and environmentally responsible waste management practices.

The Healthcare Waste Institute (HWI) is NWRA’s membership for companies engaged in collecting, transporting, treating, and disposal of regulated medical waste/infectious waste, many of whom serve generators in the state of Delaware.

HWI supports modifying 7 **DE Admin. Code** 1301 to update outdated and/or obsolete regulatory language and to clarify regulatory language. We also offer the following suggested changes to 7 DE Admin. Code 1301 (11) Special Wastes Management Part 1 – Infectious Waste.

#### **Lack of Allowance for Electronic Recordkeeping and Manifests**

The current verbiage in 7 DE Admin. Code 1301 (11.16) outlines requirements for manifests for shipments of infectious waste. This language continues to default to a multi-copy (e.g., paper) form provided by the Department and does not advance the State toward allowing use of electronic manifests consistent with the high accessibility and integration of computers, tablets, and cell phones and digital transmission of data in current business systems. HWI supports Stericycle’s comments about adding language that would allow for the use of electronic manifests and federal hazardous material shipping paper requirements.

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HWI thanks you for your consideration of this recommendation.

Sincerely,

*Sara L. Bixby*

**Sara L. Bixby**

Director of Regulatory and Environmental Affairs

**National Waste & Recycling Association**

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