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Vermont Senate Natural Resources and Energy Committee
Jen Holliday, Director of Public Policy and Communications, Chittenden Solid Waste District (CSWD)
H.158
April 14, 2023

Chairman Bray and Committee Members,

Thank you for inviting me to speak to you about H.158. For the record, I am Jen Holliday, Director of Public Policy and Communications for the Chittenden Solid Waste District.

About CSWD

CSWD is a municipality that oversees solid waste management for our member towns which is all of Chittenden County. We are managed by a Board of Commissioners that is made up of one representative from each member town. Our Mission is to **reduce** and manage the solid waste generated within Chittenden County in an environmentally sound, efficient, effective, and economical manner. Our work focuses around helping our members produce less waste and diverting as much as possible from the landfill. To do this we provide education and outreach to school children, business owners, institutions and the public about waste reduction and diversion opportunities. We also enact policy through our ordinance with requirements such as mandatory recycling that has been in place since 1993. We also advocate for state policies to further our mission such as producer responsibility laws and the Universal Recycling law.

Our facilities provide opportunities for proper management and diversion of waste and include six Drop-off Centers, a hazardous waste facility, an Organics Recycling Facility and a Materials Recycling Facility (MRF).

CSWD's Materials Recycling Facility (MRF) is where single stream blue bin recyclables are sorted and baled to be sold made into new products. This is a regional facility that services haulers beyond Chittenden County. We process about 49,000 tons of recyclables every year which is over 50% of the blue bin recyclables generated in Vermont. We contract with Casella to operate our MRF.

This MRF is 30 years old, outdated, inefficient and at capacity. Our Board made the decision to replace it with a new modern facility that will ensure our community has a local, affordable outlet for their recyclables to be managed for the next 30 years. Last November, Chittenden County voters approved CSWD to borrow \$22 million for this \$26 million dollar project. The new MRF will be built at a new location on property we own on Redmond Road in Williston. It will be equipped with modern technology that will be more efficient and accurately sort material to provide higher quality recyclables to market, better working conditions for employees and will process up to 70,000 tons of recyclables

per year with ample room for growth. We anticipate the new MRF to be on-line in early summer of 2025.

There are two sources of revenue to pay for the cost of running our MRF. Tip fees charged to the haulers, currently at \$80/ton, and the sales of processed recyclables which fluctuates with the commodities market. To give you an example of this fluctuation, paper prices last fiscal year averaged \$82.21 per ton. In March of this year, the price for paper was \$1.26/ton. Over 75% of the material we process at our MRF is fiber (cardboard and paper). Glass makes up about 12-14% and the remaining is plastic and metal containers. When prices are down such as it is with paper, we rely on the higher value material to cover the loss. PET and aluminum together make up less than 4% of the material we process however, these are some of the most valuable materials and accounted for close to 20% of the total revenue from sales of our recyclables in 2022.

Glass is the most difficult and expensive material for us to manage and market. It's abrasive and hard on the equipment and requires a significant amount of screening to remove contaminants. Due to the difficult nature of managing glass in single stream recycling, we do support policies that both divert glass from the landfill and remove it from the MRF including an expansion of the bottle bill on wine.

We don't receive any revenue for glass and pay to transport it for recycling. Glass containers received at our MRF are crushed and screened several times to make processed glass aggregate, PGA which we regularly sample and test to ensure that it meets the specifications for ANR's PGA approved uses. When the PGA meets ANR's specifications, we send it to a local quarry to mix with sand for use in construction. Utilizing MRF glass for projects locally is more economical, supports local businesses and reduces greenhouse gas emissions by significantly reducing transportation to move this material many miles out of state. We do ship some of our glass out of state to Strategic Materials in Windsor Connecticut during the winter months when it is difficult to effectively screen contaminants out and meet PGA specifications. Strategic Materials cleans our glass and uses to make new glass bottles and fiberglass.

H.158 Impact

CSWD recognizes that the bottle bill is very successful at diverting material from the landfill and we support successful diversion programs and have never advocated to eliminate Vermont's bottle bill. It is also important to recognize that the bottle bill was created in the 70's before there were any meaningful recycling programs. Now, thanks to you and your predecessors, we have other effective waste diversion policies such as the Universal Recycling Law which mandates recycling of blue bin materials and requires parallel collection for trash and recycling making it just as easy to recycle as it is to throw something away. As a result, Vermonters are recycling blue bin materials at rates comparable to the bottle bill recycling rates. According to [ANR's 2021 Biennial Report on Solid Waste](#), a key takeaway was that the Universal Recycling Law is working with Vermonters recycling 72% of mandated blue bin recyclables. The same document reported that the bottle bill redemption rate was at 75% for that same year. Both policies have been successful at diverting recyclable material from the landfill.

Our primary concern regarding H.158 is the expansion of the bottle bill that includes PET and aluminum which will decrease revenue for MRFs in Vermont and result in tip fee increases that will be passed on to Vermonters. We assume there will be a high rate of redemption because H.158

automatically increases the deposit if a high rate is not achieved. If the current rate of redemption is 75% and the PRO is required to ultimately achieve 90%, we will lose not only the materials that are in the expansion that currently go to our MRF but also materials that are already in the current bottle bill system but are recycled by consumers through the blue bin system. The estimated net revenue loss at our MRF from an expansion will require us to increase the tip fee by \$8 - \$16 per ton. This calculation includes the loss of aluminum and PET and also factors in the loss of glass from the inclusion of wine in the expansion. Glass is a net cost to manage through the MRF so the inclusion of wine in an expansion will help offset some of the revenue loss from the PET and aluminum. If the expansion stays in the bill, we urge the committee to keep wine in. I will note that Susan Collin's testimony showed a calculation of CSWD's revenue loss that only included the tip fee loss from tonnage loss and did not include commodity revenue loss. The expense for the hauler will not be made up by them hauling less material as she reported.

I will also point out that an expansion of the bottle bill will not increase diversion from the landfill. According to the [2018 Vermont Waste Characterization Study](#), only 1.1% of the material being landfilled is beverage containers that would be subject to an expanded bottle bill similar to H.158. This is because beverage containers are already being recovered at a very high rate through the existing systems. Our concern is that expansion will increase the cost of recycling without gaining additional diversion.

Finally, I would like to correct misstatements made by other witnesses about single stream recycling. Claims have been made that MRF recyclables are not high enough quality to be made into beverage containers and are "downcycled". These statements are based on speculation and are not based on scientific analyses of Vermont's MRF materials. The aluminum and PET and glass that is processed at our MRF gets sold to end markets that utilize this material to make new beverage containers just like bottle bill material. Furthermore, aluminum can be recycled endlessly. It is not better for the environment for aluminum from a beverage can to be made into another beverage can versus a durable product such as a car part that lasts many years and can be recycled again. PET from our MRF can be made into another beverage container and it can also be made into carpet or fleece or other durable products. Carpet can last 20 or more years and single-serving, single-use beverage containers are typically used by the consumer for about 30 minutes and can only be recycled 5-6 times before the plastic is too degraded to be recycled again. Both carpets and beverage containers ultimately become trash. I have not seen a lifecycle analyses for post-consumer PET that points to bottle-to-bottle recycling being superior to making durable products that last much longer. Both uses of postconsumer PET saves natural resources and energy.

Also, the statement about MRFs losing 25% of the aluminum is not the case for our MRF and I question where that data point came from. At \$1,500/ton, I assure you that we are making sure aluminum is being captured.

Thank you again for providing this opportunity.