



April 25, 2017

Senate Natural Resources and Energy Committee
RE: Potential Changes to Act 148

Chairman Bray, members of the Committee, thank you for this opportunity to provide testimony regarding potential changes being considered for Act 148—Universal Recycling Law. My name is Sarah Reeves and I am the General Manager for the Chittenden Solid Waste District. CSWD's mission is to reduce and manage the solid waste generated within Chittenden County in an environmentally sound, efficient, effective, and economical manner. We serve over 160,000 residents and over 6,200 businesses, or approximately 26% of Vermont's population.

Like our sister Districts, we are actively engaged in carrying out Act 148. **CSWD has concerns regarding changes being proffered, and respectfully requests that no changes be made at this time.** I agree with members of the hauling community that Act 148 should be reviewed from a systems analysis perspective, and I encourage you and the committee to pursue that avenue.

As you may know, CSWD is one of a handful of solid waste districts that operate or own a compost facility. Ours is Green Mountain Compost (GMC), the largest compost operation in VT. We deeply understand and appreciate the challenges this next step in the organics section of Act 148 pose for generators, processors, and haulers, and we also understand the impacts to schools, businesses, and CSWD member municipalities. That being said, no hauler has approached us to request an exemption from the law (as allowed by ANR through the Solid Waste Implementation Plan process). **We are hearing from small haulers in Chittenden County who are crafting creative ways to achieve compliance, and see this next threshold as a business opportunity.** CSWD is making a staff investment in the next few months by growing our Business Outreach program to help even more businesses comply with the Act. GMC continues to grow, and we continue to support that infrastructure investment.

One item I've heard discussed is the idea that landfilling food scraps is preferable to composting, or at least preferable to hauling the material long distances. This is misleading. The notion that landfilling organics is a "preferred process" is not supported by the EPA, ANR, or CSWD. I am a Certified Manager of Landfill Operations, and my training tells me that as soon as food scraps begin decomposing they release methane. This methane is not captured by the landfill gas electricity plant until the food scraps are completely buried. By that point, a significant amount of the methane is already in the atmosphere, due to "open working face" operations at landfills. Trucking materials long distances is a Greenhouse Gas factor to be sure. But the answer isn't landfilling food scraps. **What's needed are more local opportunities, whether it's food rescue, backyard composting, community composting, and/or on-farm composting.** Reducing food waste in general is best. Landfilling is the last resort, per the EPA's Food Waste Hierarchy.

CSWD is a member of the Composting Association of Vermont, and we support their submitted testimony.

I feel this issue would benefit from a larger, broader conversation, and I would be happy to participate if asked. Thank you for your consideration, and I am available to answer any questions you may have.

A handwritten signature in blue ink that reads "Sarah Reeves".

Sarah Reeves, General Manager
Chittenden Solid Waste District