



Composting Association of Vermont
Reclaiming Organics For Good

May 13, 2020

Senator Christopher Bray, Chair
Vermont Senate Natural Resources and Energy Committee

Re: Proposed Solid Waste Management Language Changes

Dear Senator Bray and members of the Senate Natural Resources and Energy Committee,

It's our understanding that you will be considering changes to the Solid Waste Management Language in the Universal Recycling Law (Act 148), as proposed by DEC Commissioner Peter Walke, during your COVID-19 Solid Waste discussion on Thursday May 14.

The Composting Association of Vermont (CAV) advances the production and use of compost as vital to soil health through practices that contribute to water quality, plant vigor, and environmental resilience. CAV demonstrates the value of compost through education, policy, outreach, and partnerships to reduce waste, capture energy, and create jobs. We are a statewide 501(C) (3) not-for-profit organization. Our membership includes compost facility operators, concerned citizens, and solid waste management entities responsible for representing the interests of more than 75% of Vermonters.

While we understand and support the need for solid waste management transporters to safely manage and adapt to workforce shortage issues that may be related to COVID-19, **we do not believe that there is cause to delay implementation of organics diversion as articulated in the Universal Recycling Law.** We ask that you consider the following when deliberating the recommendations to delay the July 1, 2020 date:

- **Backyard and community composting is on the rise.** Delaying the residential diversion requirement is directly opposed to the work and forward strides being made by Vermont Solid Waste Management Entities (SWMEs), CAV, and other organizations to get the word out about residential organics diversion. We have developed guidance for safe backyard and community compost management during COVID-19 and have been working with DEC, SWMEs, and others to share these guidelines.
- **We have collectively been building to the July 1, 2020 date for 6 years;** many residents have been making plans to be ready by this date and may be discouraged by a delay, or feel that their preparations were unnecessary. Through the annual Vermont Organics Recycling Summit, Backyard and Small Scale Composting workshops, well-attended webinars convened for International Compost Awareness Week, and meetings with organics haulers hosted by SMWEs (since 2017), we believe that significant progress has been made in preparing for residential organics diversion.
- **Outreach and education has been prioritized over enforcement – the July 1, 2020 date has been integral to this message.** Let's stay on track and get the process started. The need for outreach and education is by no means over as of July; losing steam at this point serves no one.

Regarding any potential workforce issue, due to the COVID-19 State of Emergency:

- **The State is in the process of re-opening**, which seems to make the temporary relief from collection of mandated recyclables (we are specifically addressing the collection of organics) during the declared state of emergency due to COVID-19 inconsequential.
- **We have not heard of workforce constraints from our members.** We understand that COVID-19 has disproportionately impacted parts of Vermont. If provisions for providing temporary relief is considered, we ask that this be something invoked only if and as a COVID-related worker shortage is demonstrated by individual haulers, and not for all haulers across the State as a matter of course.
- **Compost facilities are selling out of compost.** In response to the pandemic, Victory Gardens are on the rise. Compost facilities are selling out of product and working hard to keep up with demand. We believe it's important to continue organics collection now to ensure that we're prepared for demand over the summer and fall. Let's collectively support this opportunity to further educate Vermonters about compost, soil health and the importance of a robust local food system by keeping organics out of the landfill.

Thank you for considering CAV's concerns and recommendations. Should your Committee be considering changes to organics management, other than those addressed above, we would appreciate the opportunity to provide further testimony.

Submitted, on behalf of the CAV Board, by

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