

February 15, 2022

TESTIMONY OF LESLIE ANDERSON

President and CEO of the Propane Gas Association of New England

BEFORE THE VERMONT COMMITTEE ON NATURAL RESOURCES, FISH, AND WILDLIFE

Concerning H115 An Act Relating to Household Products Containing Hazardous Substances

The Propane Gas Association of New England (PGANE) is pleased to have the opportunity to offer its comments regarding H115 An Act Relating to Household Products Containing Hazardous Substances.

We respectfully request that the committee amend Section 4(A)(v) on Page 5 line 4-5 to read:
"The product is a non-refillable propane cannister with a capacity of less than 20 pounds."

Propane tanks and cylinders are referred to by weight or water capacity rather than gallons. A 20-gallon tank is over 80 pounds. I believe there was some confusion, and the bill was meant to address tanks under 20 pounds. 20 pound tanks already have a collection system in place.

PGANE is a regional alternative energy trade association representing members of the propane industry in the six New England States. We exist to serve the propane industry by promoting safety, education, and public awareness of the uses of propane. Our membership includes propane companies and suppliers, including numerous small companies who are often family owned and operated, many for several generations. Propane is a clean EPA alternative energy, and the use of propane accelerates decarbonization. Propane is the preferred partner with solar for zero net energy housing, and small propane tanks are portable and used for applications such as tiny homes, RVs, camping, boating, lighting, grilling, and living off the grid.

Including 20-pound (BBQ tank size) propane cylinders or indeed any refillable propane cylinder in this legislation, defeats the objectives of product stewardship. BBQ cylinders, (as these 20 pounders are commonly known), are reused and refilled multiple times throughout their long lifetime which often lasts multiple decades. The exchange market for these tanks continues to grow and these locations are located throughout VT, readily accessible to consumers for exchange or return of unwanted tanks. Indeed, there is likely an exchange cage located at your local convenience store or hardware store. **Creation of a separate collection program would create additional waste by encouraging citizens to dispose of these containers rather than reusing them through exchange programs.**

Our industry already has systems and outreach in place to educate consumers about their options for unwanted tanks and to discourage improper disposal. See the attached document "Recycling of 20-LB Propane Tanks." We also have a website <https://pgane.org/safety-and-training/tankrecycling/> which includes safety information and information on how to recycle a propane tank, including links to locations near the consumer where they can drop off cylinders at exchange cages.

Unwanted BBQ tanks are not a large problem and do not need to be included in product stewardship legislation. There is already a program in place that collects these reusable tanks. Today, our industry currently collects unwanted tanks from municipalities for free, and if there are any municipalities in need, please reach out to me and I will put them in touch with one of our nearby members. Exchange locations collect unwanted tanks at their exchange cages. Other dispenser locations throughout the state will collect unwanted tanks for a minimal fee or for free if they are unwanted tanks in their exchange program. Including refillable BBQ tank size cylinders in this legislation would increase consumers costs as the industry would have increased expenses from the administrative and bureaucratic reporting requirements of this bill. BBQ tanks are portable, and many come from out of state or leave our state, complicating recordkeeping statistics.

The exchange BBQ tank business is based on consumer value. Consumers are encouraged to return their empty containers and exchange it for a full container. The cost for exchanging cylinders is less than a new full container. Including BBQ tanks in this legislation would discourage reuse of tanks through exchange programs. We want to teach consumers to utilize exchange programs, as these have the smallest packaging environmental footprint for refillable tanks. Tanks are inspected and recertified for decades until they are ultimately recycled. There is no need for disposal of refillable tanks, they can be reused over and over and over again before they are recycled.

For these reasons, we respectfully request that the committee amend Section 4(A)(v) on Page 5 line 4-5 to read: *"The product is a non-refillable propane cannister with a capacity of less than 20 pounds."*

Thank you for your consideration.