

Vermont House Natural Resources Fish and Wildlife Committee
Jen Holliday, Director of Public Policy and Communications, Chittenden Solid Waste District (CSWD)
H.175
February 17, 2021

Madam Chair and Committee Members,

Thank you for inviting me to speak about H.175. For the record my name is Jen Holliday, I am the Director of Public Policy and Communications for the Chittenden Solid Waste District (CSWD).

CSWD does not support the expansion provision of H.175. It will increase the cost of recycling and divert very little tonnage from the landfill. We would like the Committee instead to consider H.142, EPR for packaging and printed paper which is a more robust policy measure necessary to address the tsunami of packaging that enters our waste stream every day.

- Several witnesses have used national data on recovery of deposit containers vs. non-deposit containers. Vermont statistics are what the Committee should be looking at not national statistics because we are doing much better than the national average. The bottle bill has a redemption rate of 77% in Vermont. According to the [State of Vermont 2018 Waste Composition Study](#), the recovery rate of mandatory recyclables was 72%. Therefore, the recovery rate of the mandatory recyclables in the recycling system is comparable to the redemption rates of the deposit system. This is very different than the numbers you were quoted with the national averages. Please note that it is important to look at recovery rates when comparing the two systems, not recycling rates. Recycling rates are a completely different calculation of data that is not comparable to recovery rates or redemption rates.
- When we look further into the waste composition study data, the amount of non-deposit beverage containers that are being considered in an expanded bottle bill was 1.1% of all the material landfilled in 2018. This is compared to deposit containers at 0.7% of all the material trashed by Vermonters in 2018. There is only a 0.4% difference between the deposit and non-deposit containers that are ending up in the landfill which equates to just a little over 2,000 tons. This is tiny compared to the 83,000 tons of paper, 23,000 tons of plastic film and shockingly more than 80,000 tons of food waste that were buried in 2018. These are the materials that we need to focus on. I recommend that the Committee members look at the tables in the waste composition study to see what is filling up the landfill and where you might want to target your efforts.
- There was a lot of discussion last week about contamination at single stream MRFs, so I want to briefly touch on this. In the world of MRFs, the use of the word contamination means stuff that doesn't belong there. Things like Styrofoam, hubcaps, plastic bags, clothing, banana peels even bowling balls and other non-recyclable material that people put in their recycling containers. A small fraction of contamination is also grossly contaminated recyclables like a half full jar of mayonnaise. Contamination is not greasy pizza

boxes or wine bottles that haven't been rinsed. The machinery and people who work at the MRF pull off the contamination, the stuff that doesn't belong there, as it goes through the system and most of that material goes to the landfill. Very little of this contamination is blue-bin recyclables. A small amount of these contaminants ends up in the bales of material that are sent to market. For example, film plastic such as plastic bags is a common contaminant in paper because it moves through the sorting system similarly to paper. The buyers of the paper expect a certain amount of this contamination and price accordingly based on the source they are buying from. The companies that purchase the recyclables remove this contamination in their process. It was stated that broken glass gets imbedded into paper and cardboard contaminating these streams. This is not true. Glass is broken and separated from all the other recyclables very early in the system at our MRF. We don't have broken glass in our paper or cardboard. Like Rutland our contamination rate is about 7%, which means about 7% of the stuff that comes into our facility doesn't belong there. This is much lower than the national average of about 25%. We attribute that to the Vermont culture of caring for the environment as well as our ongoing outreach and education.

- Which brings me to my next point regarding last week's testimony about education. One witness indicated that education about recycling is not being done and that there are ways to simply do this. CSWD is constantly providing outreach and education to our residents, businesses, schools, and institutions. Waste diversion related education is a State requirement for all solid waste districts and alliances. CSWD has six full-time staff whose primary job is to create educational content and provide education to the public about reducing their solid waste and diverting waste from the landfill including how to properly recycle. Our facility staff also provides education to their customers every day. And we partner with other solid waste districts and ANR regularly on education. Two years ago, we partnered with ANR on a campaign called [Recycle Like You Live Here](#). I have provided Amanda with the link to a series of [5-15 second commercials that we produced](#). This is not a one and done. We will always have to educate. It is not simple, it is not easy, and it is not inexpensive, but it is extremely important.
- Single stream recycling was talked about somewhat negatively by witnesses. Many communities all over the country have gone to single stream recycling because it captures more material by making it easier for the public. It also leaves a smaller environmental footprint for collection and transportation. We are successfully sorting and marketing 83% of the recyclables generated in the State compared to the 17% that is managed by the bottle bill. Single stream has not failed in Vermont. I invite you to learn more about our two single-stream facilities in Vermont that are the workhorses for the majority of the State's recyclables. Unfortunately we are not giving tours at the moment but I have provided [a link](#) to the page that our MRF video is on so you can take a virtual tour.
- There was mention of Casella taking #1-#7 plastic and that only #1 & #2 plastics are of value. I will briefly share how we manage plastic and what we accept and why. We accept all single-use containers and rigid plastic packaging regardless of the number on the plastic container or packaging. #1 and #2s are separated and sold and the rest of the plastics are baled and marketed domestically as mixed plastic. The mixed plastic stream makes up 0.8% of the material that we process and sell. Most of it is polypropylene (#5). The mixed plastic goes to a processor in Alabama. Two years ago, our Executive Director, Director of Operations and I all visited this facility to see for ourselves what happens to our mixed plastic and to ensure that it was being recycled. We were impressed with the business and operation which has a long history and we saw not only the clean resin that was made and sold for manufacturing other products, but we also saw the production of plastic paint cans made from some of that resin. Your yogurt tub likely becomes a plastic paint can when you recycle it. There is a lot of concern about plastic. We are concerned too. Very concerned. But this bill doesn't address the plastic

problem. It doesn't address the plastics that are not recyclable. It simply takes a highly recyclable plastic out of one recycling system and puts it into another.

- Which brings me to my next point about the term downcycling because it is used to talk about the deposition of PET bottles from a bottle bill system vs a single stream MRF. "Downcycling" is a subjective term. It is based on perception and not data analysis on what is better for the environment. There are no specifications of what downcycling is or isn't and it is not used by the EPA or other officials in the solid waste industry. [EPA's definition](#) for recycling is *the process of collecting and processing materials that would otherwise be thrown away as trash and turning them into new products*. Examples on their website of products made with recycled content include car bumpers, carpeting, egg cartons, trash bags and paper towels. Recycling is resource conservation. It's using post-consumer materials that are feedstock for new products. There is no scoring system or hierarchy of environmental benefit on what recyclables are turned into. One witness testified that 98% of the glass from deposit systems is recycled into new glass bottles and fiberglass. The fiberglass would be considered downcycling for those that use the terminology because you cannot recycle fiberglass. It's a dead end. Our PET is being sold to a company called Mohawk Industries to be used in flooring products. If the PET sold from our MRF replaces virgin petroleum made PET for the manufacturing of ANY product we see that as an environmental benefit. PET bottles cannot be recycled indefinitely into new PET bottles. This is because every time plastic is recycled, the polymer chain grows shorter, so its quality decreases. The same piece of plastic can only be recycled about 2 to 3 times before the quality decreases to the point where it can no longer be used.
- I have one last comment on some information provided to the Committee about the amount of water bottles in the waste stream that seems exaggerated and doesn't correlate to our data. A witness stated that "It is estimated that 51% by volume of curbside material is water bottles nationally." We have done PET bale sorts at our MRF and separated water bottles in those sorts. According to the data from those sorts, which I have provided as a handout to the Committee, water bottles make up approximately 17% of the volume of the PET stream at our MRF which is very different than 51% of all curbside material.
- I will move away from plastic and now talk about glass processed at our MRF and the Notice of Alleged Violation (NOAV) that CSWD received from ANR in 2018. We don't agree with the State's findings and would not characterize the projects that we used our processed glass aggregate (PGA) for as "dumping" as the media and other witnesses have. However, our Board did feel it was in the best interest of our members to settle with the Attorney General's office. We have invested over half a million dollars in a glass cleanup system and have been testing our glass regularly for contamination to make sure it meets the specifications that the state requires it to meet to be used in PGA-approved applications. Whitcomb's Quarry is currently taking this material and using it as aggregate for subbase material in projects. We are working with ANR, VTRANS and UVM on developing specifications for PGA to be used more widely and are optimistic that this will open the door for more uses for recycled glass in the State. I will note that using MRF glass as PGA is a widely accepted industry practice and that there are environmental benefits to keeping this material local rather than shipping this extremely heavy material far away to be used in similar applications.
- Finally, I will touch on the impact that expansion of the bottle bill would have on the cost to the existing recycling system. Beverage containers that are redeemed at the store or redemption center do not go to the MRFs. They are processed via an entirely separate system. Last month I shared with the Committee how China's policy has had a devastating impact on the cost of recycling. The tip fee that is charged to

haulers at our MRF is at an all-time-high of \$80/ton and the fee at Casella's MRF in Rutland is even higher. These high tip fees combined with transportation costs have driven the recycling costs for some municipalities and solid waste districts to higher levels than the cost to send waste to the landfill. Expansion of the bottle bill will increase the cost of the recycling system even further because commodities of value specifically aluminum and PET plastic that are currently going to the MRFs will be returned through the bottle bill system instead. Thirty-three percent of our revenue from sales of recyclables at our MRF in 2019 -- close to \$700,000 -- is attributable to the sale of aluminum and PET. Tip fees would have to be raised even higher than they already are to cover the loss of revenue from the sale of the material that is removed from the recycling system and that cost will be passed down to Vermonters.

In summary, expansion of the bottle bill will not move the needle on keeping recyclables out of the landfill and will add cost to the current recycling system at a time when costs are higher than ever.

We need to be thinking outside the bottle bill and move to an approach that deals with all packaging and printed paper. Packaging has become increasingly complex and difficult to recycle. Producers need to be at the table to help address the challenges of managing their products to save natural resources and reduce greenhouse gas emissions. Extended Producer Responsibility for packaging and printed paper will do this. I urge this Committee to spend some time considering H.142. H.142 is an EPR bill for packaging and printed paper that has been informed by many stakeholders including the Product Stewardship Institute, the Flexible Packaging Association, Ameripen, a packaging industry trade group, the Vermont Solid Waste Districts and Alliances, Casella and ANR. We have spent more than 15 meetings over a 6-month period working on what an EPR for packaging and printed paper program would look like in Vermont.

H.142 includes all packaging and printed paper not just beverage containers and addresses many issues that this Committee is concerned with.

- H.142 provides financial stability to the recycling system in Vermont and relieves the burden from solid waste districts alliances and municipalities.
- H.142 provides incentives to the producers to use less packaging and to design packaging and printed paper that is recyclable and to incorporate recycled content.
- H.142 has producers investing in market research and development for packaging materials that are currently difficult or can't be recycled.
- H.142 provides funding from the producers for litter cleanup in Vermont.
- H.142 requires producers to provide education to the public on how to properly recycle their materials including special collection and recycling programs that are outside the traditional blue bin recyclables.
- H.142 requires producers to invest in the recycling infrastructure so that more of their material can be recycled.

Other states including New York, Maine, Maryland, and Washington State have also introduced EPR bills for packaging and printed paper. Please consider EPR legislation for packaging and printed paper as these other States are doing. It is the best policy tool to tackle the large problem of packaging and printed paper.

Thank you for your interest in improving recycling in Vermont.