

**Comments
of the
National Waste and
Recycling Association**

on the

**Discontinuation of Vermont's
Beverage Container Deposit Law
In Favor of
Improving Commercial & Residential Recycling
(House Bill # 175)**

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Submitted by:

**Steve Changaris, Vice President
Northeast Region
National Waste and Recycling Association**

NWRA and local Vermont trash haulers and recyclers oppose HB 175. In the bottle bill's place, Vermont should re-focus and center its energy and follow a model closer to Delaware which assessed a fee at the consumer level and that fee was used to transition from bottle bill management of containers to increasing recycling programs and curbside collection. NWRA also does not support the American Beverage Association suggestions of an EPR-like program for these materials. Why create a new entity when the widely popular and convenient recycling system that exists can be bolstered and developed even more extensively?

Expanding more items to the bottle bill will hurt municipal recycling programs. The current revenues from plastic and other items help VT municipalities to support their recycling programs and by removing these items it will only cost municipalities more for their recycling programs. By not expanding and continuing VTs bottle bill program, VT will be seeing that the value of these items will subsidize VTs municipal, residential, and business recycling programs all year long. These multi-million-dollar programs will find it hard to survive without managing the current materials and items managed in their programs; and would receive a significant improvement of quality recyclable materials as VTs bottle bill is sunset. If HB# 175 were to pass, a result would be that recycling would be more costly to municipalities since some of the most valuable products would be removed from current curbside recyclables. The sunset of the bottle bill will reduce municipal costs for recycling; keeping the bottle bill and expanding it (or "modernizing" it) will increase municipal costs for recycling services -- which is why we are proposing a new VT model which will leave in place a small fee at the consumer level on containers and that money would then be used to bolster recycling programs.

Glass bottles often break when put in recycling bins, when collected by truck and when they are processed with the elaborate equipment used at VT recycling plants. When glass bottles break all the different colored bottle glass becomes mixed. This meant, historically, that getting the glass managed in the state's recycling system -- actually recycled -- was often difficult. As VT eliminates its bottle bill program, one needs to understand that municipalities and businesses -- we believe -- should have the option to continue to manage their glass containers in either a mixed or single stream recycling collection program or in a local, municipal glass recycling drop-off program. The

one or two cent, on-going legacy fee to be paid by historical bottle bill items, upon the sunset of the bottle bill would be used by VT environmental regulators to help with local government funding for glass recycling programs and other kinds of local recycling program costs. All in VT should know the recycling of beverage containers formerly covered under the bottle bill will work fine and will continue to grow -- without the inconvenience and cost of the maintaining a full and duplicative bottle bill system -- when they are managed in one system -- VTs efficient and effective single stream recycling program under the mandated Universal Recycling Law passed in 2012.

VT should sunset its bottle bill deposit system in favor of supporting and growing in-state local recycling programs and services. All redemption beverage containers once removed from bottle bill deposit coverage will then be easily and conveniently recovered in VTs fine municipal and business recycling systems.

NWRA Working Outline for Recycling and VT's Management of Beverage Containers

Build upon and improve our nationally recognized recycling system.

Advocates for the "bottle bill" call the expansion "modernization"; however, it merely is expanding a policy that has been in place for too long and fails to recognize the advances that have been made in the state's recycling programs and industry.

In fact, recycling was not around when the bottle bill was adopted. So now, decades later, why should there be a greater emphasis on a dated policy to redeem these containers as opposed to working more with convenient and modern residential and business recycling programs?

In these challenging economic times, is it fair to expand the bottle bill's scope to cover millions and millions of new items?

Since states in the northeast, and those proximate to VT do not have a \$0.10 deposit (RI and NH do not have a bottle bills at all), are there concerns about increased fraudulent redemption schemes?

What problems are an expanded VT bottle bill intended to solve?

- ***Litter?*** There are more nip liquor bottles and fast-food litter item than beverage containers.

- *Fiscal relief for municipalities?* No, real relief would be to remove glass from both the waste stream and recycling stream which would significantly reduce weight and costs for all. Yet this bottle bill expansion dictates that the lightest and most valuable products be removed from the recycling stream. As markets continue to improve, municipalities will lose additional revenue that can then never be used to offset their recycling costs.
- *Expanded bottle bill recyclables are being disposed.* See above. These items are not being disposed. The state's MRF/recycling businesses are continually investing money in to improve facilities and to streamline recycling processes without state subsidies under Act 148.
- *Who benefits from "modernization"?* Not Consumers - they will pay more for everyday products. Not taxpayers - they will not see short-term or long-term relief. Not municipalities - they will lose valuable material. Not the environment – more redemption by expanding the bottle bill does not mean increased recycling.

What is the purpose of the bottle bill in 2021? What should be done as we go forward?

- There is an alternative to put on the table which we refer to as the "**Vermont Model.**"
- In recognition of the excellent recycling infrastructure and programs that have been developed in VT, the bottle bill should be converted into a straight recycling bill as opposed to a redemption bill.
- Remove the \$0.05 deposit and replace with it with a \$0.01 or \$0.02 fee that is paid at the point of sale. Fee will be used to fund escheat lost revenues to the state, recycling educational programs and to provide fiscal relief to the municipalities for municipalities.
- Curbside recycling will remain convenient, effective, and capacity and efficiency will grow with new and improved MRF's.
- This will reduce the burden on consumers (5 cents to a penny or 2), reduce the burden on retailers who must spend time and space handling the containers, reduce carbon emissions and the MRF's will have improved revenues to share with municipal customers.