

Dear Chair Watson and members of Senate Natural Resources and Energy Committee:

I am writing on behalf of the Vermont Solid Waste District Managers Association (SWDMA) to express our strong support for [Sec. 2 of H.484](#) (Draft 1.1) as currently proposed by your Senate Agriculture Committee. Section 2 proposes to increase the pesticide registration fee and dedicate that money to pay for the collection and disposal of unwanted pesticides until a more sustainable program can be developed, like an EPR program. **This provision was developed collaboratively between the pesticide industry, the Agency of Agriculture, and the solid waste districts.**

As you may know, solid waste districts are required to collect household hazardous waste (HHW) and very small quantity generator (VSQG) hazardous waste which includes pesticides. VSQGs include institutions, businesses, farmers and governmental entities. Solid waste districts are required to provide this service by either having a permanent hazardous waste collection facility or by holding a minimum of two collection events per year.

Collecting HHW and VSQG waste is the most challenging work that solid waste districts do. Vermonters show up with all kinds of hazardous products at facilities and events, including products that haven't been produced for decades such as DDT or highly explosive substances like picric acid. Districts are required to follow complex environmental regulations and safety protocols that require specialized training to manage liability and safely dispose of these products.

These programs are also expensive to operate. For example, CSWD spends close to \$1M/year on hazardous waste collection and management through their permanent collection facility. The volume of HHW that CSWD has collected has increased by 17% in the last 10 years and disposal costs have risen by 46% during that same time. The cost per ton for hazardous waste is \$3,061/ton – compared to regular household trash which costs about \$150/ton even when you factor in transportation and fees at the landfill.

Some SWMEs hold events which require them to hire a hazardous waste contractor to hold the event. These costs have increased significantly over the past several years due to the limited number of service providers that will come to Vermont. For example, it cost Lamoille Solid Waste District \$75,000 last year to hold their two required events serving 475 participants. That's more than \$150 per person.

Pesticides are one of the more toxic materials collected and make up close to 10% of the materials managed through hazardous waste collection programs. The Agency of Agriculture has provided funding for solid waste districts to collect pesticides for many years. The funding has been used to cover disposal costs as well as collection costs. This funding has not kept up with the increase in volume and costs over time. Today, districts receive on average less than half of what the costs are to collect and dispose of pesticides. The balance is borne by our local taxpayers. **Sec. 2 of H.484 will have a significant positive impact on solid waste district's ability to cover the costs associated with this important mandated service.**

Jen Holliday at CSWD, copied here, is a good resource if you have questions.

Thank you

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Necrason Group