



February 19, 2021

To: Maryland House Environment and Transportation and Economic Matters Committees
Re: HB 866 Environment - Business Recycling Reporting Requirements

The Maryland Recycling Network's members are involved in all aspects of recycling. We are community and county recycling coordinators responsible for implementing and overseeing recycling programs, private sector companies that collect and process recyclables, agencies, non-profit organizations, and recycling activists. We promote sustainable reduction, reuse and recycling (the 3 R's) of materials otherwise destined for disposal and the purchase of products made with recycled material content. We achieve these goals through education programs, advocacy activities to affect public policy, technical assistance efforts and the development of markets to purchase recycled materials and manufacture products with recycled content.

The Maryland Recycling Network supports the need for better recycling data, as envisioned by HB 866. Better data will give the state, local governments and Maryland recycling companies, a better gauge to measure progress and to determine necessary improvements in recycling education and processing equipment.

However, better data does not come without a cost. Most Maryland counties and municipalities have only one staffer assigned to recycling. Ensuring that recycling programs are running smoothly is their highest priority. Unfortunately, the time and effort required to track down individual businesses for their recycling data is not the most productive use of their time. This is especially true for the thousands of small businesses and apartment houses in their county. We are also concerned about the potential for double counting since most of the non-reporting businesses are small generators. The recyclables collected from small businesses are likely to be included in the data submitted by the companies that collect their recyclables or are included in the recycling data generated at the county's transfer station. If a county were to spend the time and effort to contact and receive recycling data from each small business located in the county, the marginal increase in reported recycling would be exceeded by the higher cost of obtaining that data.

The Maryland Recycling Network applauds Delegate Smith for her interest in improving recycling in Maryland. We would like to work with her to determine a better way of getting commercial recycling data. We would focus, in particular, on the larger commercial generators of recyclables, many of whom are likely to self-haul to processing facilities or end markets that may or may not be located in the state of Maryland. We would also like to work with the Delegate and MDE to create an on-line form that Maryland businesses can use to report their recycling activities.

As always, the Maryland Recycling Network stands ready to serve as a sounding board and resource for legislators and others interested in pursuing our mission. Please do not hesitate to contact me via email phoustle@marylandrecyclingnetwork.org, phone 301-725-2508 or mail - MRN, PO Box 1640, Columbia MD 21044 if you have any questions or would like additional information regarding the above. We look forward to working with you to continue the strides we have all made to improve Maryland's recycling programs in a time- and cost-effective manner.

Sincerely,

Peter M. Houstle
Executive Director