



Madame Chair and members of the Senate Commerce Committee:

My name is Julie Ketchum and I am the Director of Government Affairs for Waste Management. I am here today to testify on SB 75, regarding increased documentation and reporting requirements for plastic crates that are used to transport products, primarily beverages and eggs. Waste Management opposes these new regulation because they are overly burdensome, target one type of recyclable material, and would result in an overall negative impact on recycling these plastic containers; that is, if enacted, I believe most recycling companies would choose not to pick up what is clearly a recyclable item.

I think if I shared with you how a recycling collection operation is conducted, it might help you understand how these requirements would increase the administrative burden, or would result in decreasing the efficiency of collection-- both of which would subsequently increase the costs of collecting this material and ultimately would cost recycling customers, homeowners and businesses, an increase in their residential and commercial recycling rate.

First, when recyclable materials are placed at the curb or in a large commercial recycling container, these plastic crates could be buried; that is, our driver, some of who will be collecting in the dark, very early in the morning, will not be able to even see whether one of these plastic containers might be in customer's recycling container. Some of these recycling routes use automated trucks, recycling is collected with automated Front End loaders and tipped into the truck, all without requiring the driver to lift or sort through these recyclables. Automation in our industry has reduced costs significantly for us in terms of worker's compensation medical claims, injuries to our workers, and has increased efficiency tremendously---all of which keep our costs down so that we can recycle even more material.

Our concern is that we may unknowingly collect this material, and it may find its way into our recycling facility without our knowledge---yet we could incur penalties for the collection and handling of this material if we cannot produce the documents required by the legislation. We are very concerned about being put in this position.

The legislation seems to be a lot of work just for one material. If the law were put into place, we may have to list it on our educational materials as "non-recyclable". We would not want to collect these plastic containers due to the increased level of documentation: driver's licenses, proof of sale, and logging all of the information about where one or two of these plastic crates came from. Furthermore, our drivers pick up these materials in carts, roll-off boxes and compactors and have no way of knowing the origin of the material or any of the data that is required by this legislation.

While we do not know what situation has prompted SB75, we assume there may be some unlawful activity related to procuring and selling this material that may be limited to just a few instances. We wonder whether there may be another avenue to deal with the root cause of this situation that will not result in increased recycling costs, unnecessary and overly burdensome reporting, or that negatively impacts the collection and recycling of this material.

Thank you for the opportunity to comment on this important matter.