

**SOUTH SHORE  
RECYCLING  
COOPERATIVE**  
<http://ssrcoop.info>



320 Dover Rd.  
Westwood, MA 02090  
781.329-8318  
fax 781.329-2097  
[ssrecyclingcoop@verizon.net](mailto:ssrecyclingcoop@verizon.net)

March 22, 2016

Chairman Brian Dempsey  
House Committee on Ways and Means  
State House  
Room 243  
Boston, MA 02133

Dear Chairman Dempsey:

The solid waste managers of the fourteen Member Towns of the South Shore Recycling Cooperative vigorously oppose the elimination of the existing bottle deposit system, and the **addition of responsibilities to municipalities**, as proposed in H646, for the following reasons:

- Only about **40%** of the municipal solid waste generated in Massachusetts is under **the control of municipal governments**. The rest is handled by the commercial sector.
- Municipalities already do **more than their share in managing consumer product waste**. They provide **access** to comprehensive recycling to about **80% of Mass. households**, far more than the commercial sector in both residential and non-residential locations. Many municipalities lack the staff to pursue and administer competitive grants such as those proposed in these bills.
- Elimination of the bottle deposit system would **add significant amounts of glass to our recycling streams**, which is becoming increasingly costly to manage. Shards of glass from Single Stream Recycling programs stick to the paper stream, creating problems for paper manufacturers. Much of the “sorted” glass from Single Stream is too contaminated for glass recyclers to make into new glass. At \$30/ton, adding more glass to Single Stream Recycling will drive up the costs even more than they have been in the past three years. This material is best kept separate as it is in the deposit system, where it has the most value.
- **If municipalities are anticipated to be critical partners in this program, why aren't they represented on the proposed Solid Waste Management Board?**
- Adding a one cent tax to the small universe of packaging proposed in these bills would generate about **\$45 million/year, half which would go to the General Fund** (see Section 5). Therefore, the **funding projections** stated by the proponents of \$38 million/year **are overstated**. Over the three year “life” of the tax, and with the projected \$21 million from unclaimed deposits, the fund, which is subject to appropriation, would potentially accrue \$93 million, not the \$135 million stated by the proponents.

- **Far more study of the impacts of this bill** is needed before contemplating its substitution for the current system. I would pose the following questions to start:
  - How much would it cost to establish **effective programs that do not rely principally on municipal governments** to implement as envisioned by this proposal?
    - The ten-day **Marshfield Fair** provides a hint as to the costs of comprehensive recycling at events. The SSRC, with assistance from MassDEP, started a recycling program at the Fair for bottles, cans and cardboard in 2004. Without the **large volunteer effort, and the donation of containers and hauling** by a recycling service provider, the program would cost the Fair at least **\$2,500/year**.
  - Would the amount appropriated be distributed effectively enough, and without mandates for implementation in the private sector (as proposed in [H3420](#)), to create the **needed infrastructure changes for both collection and processing** to achieve **the high recovery rate** the current deposit-redemption system does?
  - Since redemption isn't proposed, **why doesn't the tax extend to other products and packaging commonly littered**, such as fast food packaging, candy and chip wrappers, etc, as it is in [H3418](#).
  - What would prevent the proposed Municipal Recycling Enhancement Fund from **not being appropriated to its stated purpose**, or even **eliminated**, as the Clean Environment Fund was when it existed?
  - What if it is passed, and is **found to be ineffective**? There is no mechanism to measure its efficacy, or to bring back the current redemption system in that case.



H646 could be effective as an adjunct to the [Universal Recycling](#) bill, H3420, as a funding source. It could also be incorporated in the [Packaging Product Stewardship](#) bill, H3418. To be effective, though, it would have to be much **more aggressive in the scope** of packaging it covers, and **less reliant on municipalities** fighting for grant money to enact the needed infrastructure changes.

**The South Shore Recycling Cooperative urges the House Committee on Ways and Means to take no action on H646.**

Respectfully,

Claire L. Galkowski, Executive Director

CC South Shore delegation: Representatives Garrett Bradley, Thomas Calter, James Cantwell, Josh Cutler, David DeCoste, Geoff Diehl, Robert Koczera, Ronald Mariano, James Murphy, Mathew Muratore, Keiko Orrall