To: Maryland Senate Education, Health, and Environmental Affairs Committee
Re: SB 370 Environment – Recycling – Commercial Properties

The Maryland Recycling Network promotes 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.

We are writing to share our general support for the spirit of SB 370 Environment – Recycling – Commercial Properties, however, we would like to meet with authors to address the practical problems in the bill as written and offer recommendations for a more effective commercial recycling bill. Specifically,

1. It is unnecessary and expensive to amend a county's solid waste management plan to accommodate the specific requirements of the legislation regarding recycling by commercial entities. We recommend this provision be struck from the bill.

2. The definition and identification of “Commercial Properties that are occupied by one or more Commercial Entities with a total of at Least 200 Full–Time Employees” is unclear and open to misinterpretation. There is also some concern with potential ambiguity in the execution of the requirement in the specific text “each owner of a commercial property shall provide for recycling for the employees on the property…”

We suggest the law could be written to more effectively address commercial recycling but needs additional improvements to achieve that goal. We would be happy to meet with the authors to discuss this legislation further.

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-effective and cost-effective manner.

Sincerely,

Peter M. Houstele
Executive Director