



May 9, 2022

**To: Senate/House Environment and Natural Resources Conference Committees
SF 4062 Omnibus Environment**

From: The National Wastes and Recycling Association (NWRA)

Through: Douglas Carnival, McGrann, Shea, Carnival Law Firm

RE: SF 4062 Testimony

The National Wastes and Recycling Association (NWRA) appreciates the opportunity to provide testimony supporting the following provisions of the Environment and Natural Resources Omnibus bill (SF 4062).

Support

NWRA Supports Additional funding for SCORE. While the NWRA supports the Senate language for one time funding of \$700,000, we do believe that significantly more funds are needed county waste reduction and recycling programs. Funds in the House version of the bill (\$10M non-earmarked funds for waste prevention and assistance, \$1.5M for zero waste, \$150,000 for multi-family compost) should instead be given to counties through the SCORE program.

NWRA Supports PFAS Source identification, NWRA supports looking at products and waste streams as sources of PFAS. Solid waste facilities are not the true "source" of PFAS, but rather we are the "receivers" of waste that contains PFAS.

NWRA Supports Chemical Plastic Recycling, NWRA supports the development of end markets for plastics that currently cannot be recycled. Chemical plastics recycling will reduce plastics in the waste stream.

NWRA Supports permitting efficiency and unadopted rule language on the Senate. The NWRA supports measures to reduce the lengthy permitting process; in particular; we support restricting MPCA's use of guidance documents and policy plans to establish policies and standards outside of the Administrative Rulemaking process. This practice denies the opportunity for involvement by the regulated community and general public.

NWRA Supports Restrictions on the PFAS Monitoring Program. The legislature's final decision to not fund many of MPCA's PFAS funding requests in the 2021 legislative session reflects the "wait for EPA" sentiment on PFAS. Monitoring costs to research and identify risks should be borne by the state, not the regulated community.

For future consideration related to Capital Assistance Bond Projects: Solid waste projects can affect existing infrastructure and MPCA is not conducting upfront review of the existing public and private facilities as they are required to by Minn. Stat. 115A.(a)(6). Changes to statute are needed so that the analysis does not occur after funds are appropriated.

Oppose

NWRA opposes MPCA funding for Waste Prevention and Assistance and this funding should go to counties through SCORE Instead:

* **\$10M in funding to MPCA** Technical Assistance and Grants, the purpose of which has not been identified; and,

* **\$150,000 for multi-family composting pilot projects and \$1.5M for zero waste grants.** These funds would be used primarily in metro areas. SCORE funding ensures a statewide funding source that is not metro-centric, nor biased towards more developed solid waste systems.

NWRA opposes expedited rulemaking to change eligibility for CAP grant program and to increase the state obligation from \$2M to \$5M per solid waste project. Increasing the amount of funds from \$2M to \$5M is a significant increase that creates concern due to the significant amount of funds for projects potentially competing with the private sector.

NWRA opposes funding to MPCA for PFAS implementation and enforcement of PFAS. It is NWRA's position that the state should wait until US EPA establishes federal regulations.

Conclusion: The NWRA thanks the House and Senate members of the Conference Committee for the opportunity to testify on these important issues.