

**Testimony to the Committee on Environment and Natural Resources  
March 17, 2025**

**Re: Opposition to LD 231—An Act to Update the Solid Waste Management Hierarchy**

This is a very bad and concerning bill, and I write to express my strong opposition. When the legislature established Maine's solid waste management hierarchy ([38 MRSA §2101](#)), the priorities were determined following careful research and consideration, consistent with other states in New England, and modeled after the U.S. EPA's program. As a refresher, the priorities can be summarized as follows:

1. Reduction, at its source, of the amount and toxicity of waste generated;
2. Reuse of waste;
3. Recycling of waste;
4. Composting of biodegradable waste;
5. Processing, including incineration, to reduce the volume of waste for land disposal;
6. Land disposal.

***This hierarchy is legally binding: "It is the policy of the state to use the order of priority in this subsection as a guiding principle in making decisions related to solid waste management."***

Now, just because Maine is not meeting the goals of its solid waste management hierarchy, it does not mean we should amend the hierarchy.

It is critical to hold incineration to its low priority on the list, as it is a highly polluting waste management method. Burning releases toxins into our air, land, and water, and subsequently into our bodies. For example, highly carcinogenic dioxin is formed during incineration. The process also releases particulate matter, which enters lungs and can cause respiratory issues; sulfur dioxide, which also causes respiratory issues (e.g., it can exacerbate asthma); nitrogen oxides, which are major contributors to smog and other types of air pollution; and heavy metals (e.g., mercury, lead, and cadmium) that accumulate in landfills and ecosystems.

Maine has a waste crisis; there is no doubt about that. But we cannot burn our way out. LD 231 represents a major setback to the hard work done over many years. It will not further our goals or solve our waste problems.

Thank you for the opportunity to express my opinion.

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