

May 5, 2023

Honorable Stacy Brenner
Chair, Committee on Environment and Natural Resources
Members of the Joint Standing Committee on Environment and Natural Resources
Cross, Building Room 216
100 State House Station
Augusta, Maine 04333

RE: Opposing LD 1660 An Act to Provide That Advanced Recycling Facilities Are Subject to Solid Waste Regulation and That Advanced Recycling Does Not Constitute Recycling

Dear Chair Brenner and Members of the Committee on Environment and Natural Resources,

PRINTING United Alliance respectfully requests your do not support LD 1660 An Act to Provide That Advanced Recycling Facilities Are Subject to Solid Waste Regulation and That Advanced Recycling Does Not Constitute Recycling.

As background, the Alliance represents the interests of facilities engaged in producing a wide variety of products through screen printing, digital imaging, flexographic, and lithographic print processes. The print industry is comprised primarily of small businesses, with approximately 95 percent of the printing industry falling under the definition of a small business as described by the Small Business Administration

The Alliance supports Maine legislator's efforts to protect its communities, environment and natural resources, however we respectfully oppose LD 1660 for the following reasons:

- This bill provides that advanced recycling technologies are not considered recycling facilities or recycling. ME LD 1660 prohibits advanced recycling technologies including pyrolysis and gasification from being considered recycling and instead links these technologies to the destruction of waste materials under solid waste regulation. Advanced recycling processes remanufacture post-use plastics back into useful products.

Advanced recycling enables our ability to remake many "hard-to-recycle" plastics which cannot be recycled through mechanical recycling operations. Advanced recycling helps us decrease plastic waste by taking products that currently do not have strong end markets (e.g. films, pouches, tubes) to be converted back into their basic chemical building blocks. It supports continued progress toward zero waste and sustainability goals for communities and states. And it enables us to turn more plastics into a wide variety of new products—including highly regulated applications such as food-grade packaging— instead of landfilling them.

- This legislation in contrary to 24 other states that have passed legislation to properly classify advanced recycling facilities as manufacturing operations. Advanced recycling legislation has passed in 24 states that include bipartisan legislation that moved forward in Kansas, Michigan,

Pennsylvania and Virginia. Legislation has also passed in Indiana and awaits the Governor's signature.


Democratic Governors Laura Kelly (Kansas); J. B. Pritzker (Illinois); Ralph Northam (Virginia); John Bel Edwards (Louisiana); Andy Beshear (Kentucky); and Gretchen Whitmer (Michigan) signed legislation classifying advanced recycling as manufacturing. These states recognize the ways that advanced recycling can contribute significantly to a circular economy wherein plastics are repurposed rather than disposed.

- Advanced recycling is NOT incineration. Advanced recycling converts post-use plastics into their original building blocks, specialty polymers, feedstocks for new plastics, waxes and other valuable products. This process takes place in the absence of oxygen or very little oxygen. Combustion requires oxygen. Incineration is the combustion or destruction of unsorted municipal solid waste.
- Advanced recycling facilities are subject to the federal, state and local regulatory authorities. A [recent report](#) found that averaged-sized advanced recycling facilities have air emissions that typically are on par or lower than common industrial facilities such as food manufacturing and community institutions such as hospitals and universities.
- These technologies are not expected to produce dioxins and are strictly regulated and monitored by federal, state, and often even local air emissions authorities. Advanced recycling facilities are subject to the Clean Air Act, the Clean Water Act, and state and local authorities. They also need to obtain operating permits from applicable states and continue to monitor and report various air emissions as they operate. AR facilities would also be subject to potential fines and closure for operational and product safety violations. State environmental officials have the tools they need to properly regulate the facilities.
- This legislation would close Maine to economic opportunities of advanced recycling. These investments have the potential to serve new markets in the coming months and years. If Maine became a hub for advanced recycling technologies and converted just 50% of the currently landfilled plastic feedstock in the state, it could generate over \$78 million in economic output each year and up to 310 manufacturing jobs. The premise of LD 1660 therefore would limit Maine from benefitting from these investments and economic development opportunities.

In closing, the Alliance would like to reiterate the importance of distinguishing the conversion of everyday household plastic items and packaging via manufacturing processes such as pyrolysis and gasification from the destruction and disposal of hazardous, non-plastic waste. The processes which remanufacture plastics back into useful products should remain distinct from other processes that dispose of waste. We urge the committee to oppose LD 1660 to ensure that Maine ability to recycle and recover more types of plastics be protected, while simultaneously ensuring state leaders can protect their communities from unwanted development.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Gary A Jones". The signature is written in a cursive style with a large initial "G" and a long horizontal stroke at the end.

Gary A. Jones
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