



March 22, 2021

Representative Pam Marsh  
Chair  
Committee on Energy and Environment

Re: House Bill 3372

Dear Chair Marsh and Members of the Committee:

The Automotive Recyclers Association (ARA) represents the interests of over 4,500 professional automotive recyclers across the United States and in 17 countries internationally. ARA is dedicated to the efficient removal and reutilization of genuine Recycled Original Equipment (ROE) manufacturer automotive parts. On behalf of the professional automotive dismantlers operating in the state of Oregon, ARA appreciates the opportunity to provide written testimony regarding House Bill 3372 and the -1 Amendment.

First, ARA applauds the intent of HB 3372 as well as Speaker Kotek's commitment to purging the state of the chronic "bad actors" that not only pose a threat to our environment and consumers but are also a threat to the professional automotive recycling industry. Law-abiding, licensed, professional automotive dismantlers adhere to stringent environmental, safety and quality control processes in order to provide consumers with an economical alternative to new OEM parts. Our members *want* a level playing field in which to compete. It is unfortunate that our industry was not included in more stakeholder discussions prior to introduction of this legislation, but we are dedicated to working with Speaker Kotek, the Department of Environmental Quality, and other stakeholders going forward to identify workable ways to punish chronic offenders.

After reviewing HB 3372 as introduced as well as the -1A Amendment, ARA has several areas of concern/question that we feel must be addressed to avoid potential unintended or negative consequences on professional dismantlers. Further clarification is needed on many of the legislation's key elements. This includes the proposed review process – what are the time periods for review, who is conducting the review and what are his/her qualifications, who is required to obtain applicable state records (DEQ or the applicant), how will related business operations in other localities or states be handled? How will new applicants with no prior compliance history be handled? Considerations must be made for entities with violations in one area (air, water, waste) but are pursuing a permit in another. What range of violation severity will be assessed?

Again, ARA appreciates the opportunity to provide this feedback and welcomes the opportunity to continue this important discussion.

Sincerely,

A handwritten signature in black ink that reads "Sandy Blalock". The signature is written in a cursive, slightly slanted style.

Sandy Blalock  
Executive Director