

**Testimony by Craig Campbell representing the Oregon Refuse and Recycling Association (ORRA) before the House Committee on Climate Energy and the Environment re HB 3018**

**February 18, 2025**

**Chair Lively, Vice-Chair Gamba, Vice-Chair Levy, and members of the committee,**

For the record, I am Craig Campbell, the Governmental Affairs Director of the Oregon Refuse and Recycling Association. I am here to share our concerns with HB 3018, but I hope these can be addressed through amendments.

**Capacity – Expansion is a long, expensive, and complicated process**

To increase capacity to handle the additional food waste required by HB 3018 will require land use permits, an amendment to solid waste plans, engineering and construction of new facilities and the expansion of existing structures and permitting by DEQ.

DEQ permits regulate what can be collected for composting. Depending on the compostable material, these permits impose restrictions on how the facility treats its composting materials to prevent the propagation, harborage, or attraction of vectors, minimize odors, reduce the spread of pathogens, and protect against stormwater and wastewater runoff. Composting food waste requires tighter restrictions than composting without food waste.

Volume limitations are specified within the conditional use permits on existing recycling facilities. So, unless they are sufficiently under capacity, existing facilities will need to amend their conditional use permits in order to accept the additional composting materials. To be sited or expanded, composting facilities must be granted a conditional use permit by the city or county where they are located. These permits limit the volume of material the facility can handle and are often not greeted favorably by local residents, and as a result are difficult to acquire.

Once the conditional use permit is granted, the facility must be built according to engineering designs, which also limit the amount of compost material a facility can handle. Existing facilities must undergo engineering and construction for expansion.

**Maintaining Aerobic Balance – The recipe is critical to success**

To ensure composting remains aerobic, each facility follows specific recipes to maintain the balance necessary to prevent the composting process from turning anaerobic. When the compost transitions to an anaerobic condition, the composting requires longer to complete, it creates stronger odors and produces lower composting temperatures that are

less likely to destroy weed seeds and pathogens, and result in immature or unstable compost that is bad for your garden.

These recipes dictate the proportions of each type of material to prevent anaerobic conditions. Food waste is a tricky ingredient that can only constitute a small percentage of the overall composting material. So, increasing the amount of food waste a facility accepts requires them to source proportionate amounts of non-food waste compostable materials to maintain the recipe.

Funds for the expansion and operation of composting facilities come from tipping fees, set along with other garbage and recycling collection rates, and the sale of composting material. This brings us to the final challenge.

### **Markets – Adding supply without demand**

Making sure markets existed for recycling materials was an important part of the Recycling Modernization Act. Without demand for the finished product, producing more compost presents more challenges. The result could be a surplus of compost material that must either be given away, creating a financial loss for composters, or become expensive solid waste ending up in landfills after a costly process.

### **Federal funds for food waste management are problematic.**

The final concern revolves around potential federal grants. First, if this bill passed it would require food waste composting, and statutorily required programs are not eligible for grants. Second, it is likely these funds are frozen at the federal level due to the change in administration, so at a minimum, their fate is uncertain.

All this may sound like opposition to the bill. We acknowledge that composting is not as simple as it seems. If it is worth doing, it is worth doing correctly. I want to thank OSPIRG and Representative Neron for their open communication. We hope to address these challenges and reach a point where we can support the bill.