

May 3, 2019

The Honorable Ron DeSantis  
Governor  
State of Florida  
The Capitol  
400 S. Monroe St.  
Tallahassee, FL 32399

Dear Governor DeSantis:

**Re: In Opposition to House Bill 771 and Senate Bill 816**

On behalf of the below organizations and companies in the recycling-connected industries, we express our opposition to Section 1 of House Bill 771 and Senate Bill 816. Collectively, our industries sort, process and purchase recyclable materials throughout Florida.

Both bills will fundamentally modify recycling contract requirements for Florida's municipalities, cities, counties and towns. It may also prohibit municipalities from offering core recycling services to their residents.

While we recognize the challenges imposed, and the education needed, to reduce recycling contamination, we cannot support the overly prescriptive nature of this legislation, as outlined below.

The legislation requires the development and inclusion of a "contaminated recyclable material" (CRM) definition in recycling contracts, after a review of "available composition waste studies", "availability of end markets" and "other relevant factors".

These CRM metrics are subjective, undefined and insufficient to address statutory contract changes for the 412 incorporated municipalities in Florida. For example, what waste composition studies would be reviewed, how are the availability of end markets defined, what is meant by "other relevant factors?"

As drafted, the legislation offers no program stability for the municipalities expected to provide recycling services to their constituents, and creates uncertainty for manufacturing and other industries that purchase recyclable materials throughout Florida. All current recyclable materials are subject to inclusion as a CRM, and potentially prohibited from residential recycling programs.

October 1, 2019 is the start date for which the CRM definition must be included in renewing or new recycling contracts between municipalities, their contracted recycling companies and the materials recovery facilities.

This very short timeframe is insufficient to address or even comprehensively review the undefined waste composition studies and other materials. We recommend a substantial phase-in period for any legislation addressing recycling contracts, so municipalities and all stakeholders may have adequate time to discuss proposed changes with their recycling service providers and constituents.

We look forward to supporting legislation that would reduce recycling-related contamination in the state.

Sincerely,

The Aluminum Association  
Anchor Glass Container Corporation  
Glass Packaging Institute  
The Institute for Local Self-Reliance  
North American Insulation Manufacturers Association  
Owens Corning  
The Plastics Industry Association (PLASTICS)  
Strategic Materials, Inc.

