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# California Resource Recovery Association

May 19, 2010

Honorable Charlie Crist  
Governor of the State of Florida  
The Capitol  
400 South Monroe Street  
Tallahassee, FL 32399-0001

Re: HB 569 and SB 1052 - Disposal of yard trimmings at a Class I landfills

Dear Governor Crist,

Please veto the recently passed HB 569 and SB 1052, repealing Florida's longstanding ban on landfill disposal of yard trimmings. Overturning this ban is bad for the economy and terrible for the environment.

The California Resource Recovery Association (CRRA) is California's statewide association of recycling and material management professionals, including municipal and private recycling program operators, as well as organics recyclers, collectors, processors. CRRA is committed to supporting the highest and best use of organic materials as essential to soil and ground water quality, as well as sustainable crop production.

CRRA is in alignment with the US Composting Council and the Solid Waste Management Association of North America (SWANA) 2006 statement that advances in landfill technology:

*"should be accomplished without encouraging more organics to be placed in landfills, and without reversing hard won and effective programs and regulatory efforts that have raised recycling rates for organic residuals. Energy recovery, in bioreactor or conventional landfills, must be pursued without relaxing recycling initiatives and without improperly creating incentives for more land disposal."*

HB 569 and SB 1052:

**Will hurt Florida's small businesses.** Florida's 264 registered facilities that manufacture compost and mulch from yard trimmings employ 1000 workers, whose jobs these bills will place at risk, along with associated jobs. These small businesses are largely locally owned and operated. The Institute for Local Self Reliance has documented that compost production creates four times as many jobs as landfilling the same material. HB 569 and SB 1052 represent a huge step backwards for Florida's local and green economy.

**Will not contribute to energy independence.** Yard trimmings, due to its high lignin content, decompose slowly and only partially in a landfill environment, contributing an insignificant amount to Florida's energy needs. The energy argument obscures the real goal - increased landfills revenues. Furthermore, the compost that would be produced from yard trimmings reduces the use of energy intensive products including fossil fuel based fertilizers. It also significantly reduces the demand on crop irrigation water.

**Will harm the environment.** Only a fraction of the methane that is generated will be captured by the collection system (estimates vary considerably: the EPA puts the capture rate at 75%, while the Intergovernmental Panel on Climate Change states that over the landfill's entire life that rate may be as low as 20%). The fugitive methane is 30 times more harmful to global climate change than the carbon dioxide that would be generated if the yard trash were composted instead of landfilled. Additional benefits to the environment from using the compost produced from yard trimmings includes improved water quality, reduced irrigation needs, healthier plants and improved storm water management. As Florida State researchers have shown, compost's benefits would help improve yields in a number of crops. These critical environmental benefits will be placed at risk by a repeal of the landfill ban on yard trimmings.

**Contradicts your own laws and the US EPA.** Title 29, Chapter 403, section 703 of the Florida Statutes, defines "Recycling" as "any process by which solid waste, or materials that would otherwise become solid waste, are collected, separated, or processed and reused or returned to use in the form of raw materials or products." Burying yard trash in landfills, methane collection or not, is not recycling, because there is no return to use. Directing the DEP to award recycling credit for disposal defeats the purpose of tracking waste reduction and recycling quantities, and is contradictory to the EPA hierarchy of reduce-reuse-recycle.

A veto of this legislation is a vote for small businesses and environmental quality in Florida, and true sustainability.

Sincerely,

*J. Muir*

Julie Muir  
President