



Northeast Region

**Memorandum In Opposition**  
**Extended Producer Responsibility Program**  
**HB 4851 (Day)**

This memorandum is submitted in opposition to HB 4851 on behalf of The National Waste & Recycling Association (NWRA) Massachusetts Chapter. NWRA represents the private sector waste and recycling services industry in this great state. Our members are responsible for 26,000 jobs in Massachusetts; a payroll in excess of \$1.3 billion and \$5 billion in annual state revenues; and an average annual compensation of nearly \$ 58,000.00 per employee. Our members are also committed to supporting the development of economically sustainable and environmentally friendly recycling.

HB 4851 would create an Extended Producer Responsibility (“EPR”) program in the Commonwealth of Massachusetts somewhat similar to programs signed into law in Maine and Oregon last year. After reviewing the bill in detail, NWRA would like to take this opportunity to officially oppose the bill and express its concerns regarding several aspects of the legislation, as there are fundamental concepts reflected throughout which are contrary to NWRA’s position regarding government mandated EPR programs. These aspects include existing infrastructure and the long-term investments we have made, municipalities’ ability to maintain local control, timelines for creation and implementation of an EPR program, and the importance of thorough stakeholder engagement.

Massachusetts already has an incredibly successful recycling system in place. Eunomia, an organization dedicated to achieving better environmental and commercial outcomes around the world, listed the state as one of the top in the country in a recent recycling study. Further, York University in Toronto, recently did a study of the EPR program in British Columbia, and found that the program was driving up prices due to packaging companies passing on costs to consumers. This is not something we need in Massachusetts in this current economic climate.

Our member companies have been and continue to do the work of managing our collective waste and recyclables in the most effective, efficient and sustainable ways possible and have a firsthand perspective on such matters. We feel though at the end of the day, that EPR is simply a solution looking for a problem. Implementing an EPR program in Massachusetts will only result in increased costs across the entire economy and yield zero environmental benefits.

If helpful, we would be happy to discuss in more detail our concerns and perspectives on how we can work together to further strengthen recycling in the Commonwealth and find common-sense solutions for a better environment that benefits everyone.

In closing, NWRA strongly urges you to oppose H4851.