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Wayne,

It is our understanding that the Minnesota Legislature has directed the Minnesota Pollution Control Agency (MPCA) to produce a report that details recommendations for a statewide "recycling refund program" for beverage containers that achieves an 80 percent recycling rate.

The purpose of this letter is to provide input in regards to the proposed legislation and our concerns about implementation of such a program. While we realize that the driving reason for such a proposal is to increase the recycling rate for aluminum, glass and plastic beverage containers, and we believe in this common goal, it is our opinion that there are far too many unanswered questions and potential negative impacts for us to support such a deposit system. We are especially concerned about the inclusion of gallon size containers and "all beverage containers" language that includes milk jugs, liquor, wine, beer bottles and aseptic containers.

Rural areas such as Redwood County will struggle with the "return" of these containers if only one redemption center is located within the county as the draft proposal indicates. With a county of only 16,000 people and an area of nearly 900 square miles, the "convenience" factor becomes another issue we are concerned with. Presently, nearly 100 percent of Redwood County residents have either a curbside recycling program or a rural recycling drop site within five miles of their residence. These sites or curbside programs allow residents to deposit all of the "selected" bottle bill materials (with the exception of aseptic containers) and a wide variety of other recyclables just minutes from where they live. With only one or even two redemption locations in the county, the convenience factor is far greater with the existing programs.

As a County with a very active recycling program and a Material Recovery Facility that is owned, operated and managed by the County, we believe that there are other options available for increasing not only the targeted beverage containers, but ALL of the recyclable materials currently collected in our area. For many years our program has accepted materials for recycling that most other Counties in the State are just beginning to accept, and other materials we process that were deemed "unacceptable" for recycling by other counties. We have written numerous grants to help establish "away from home" recycling at area gas stations and convenience stores, targeting the same materials selected for this proposed "refund program." These "pop bottle bins" have been incorporated into all but about three gas stations in Redwood and Renville Counties, and provide another convenient location for disposal of "beverage containers." This does not mean that our program is better than anyone else's, it simply means that we are willing to do the extra research and work to make this possible. We believe that this approach has and will increase the recycling of all materials, not just the ones mentioned in this proposed legislation.

Recently, Redwood County entered into a Joint Powers Agreement with Renville County to form the Redwood/Renville Regional Solid Waste Authority. With the formation of this JPE, the organization has secured funds to construct a new MRF and transfer facility to handle the materials generated within the two County area. This project has a nearly five million dollar price tag, and revenue from the sale of aluminum, plastic, glass, and other materials has been factored into the operating costs of this facility. Furthermore, this organization made plans to increase the recycling rate of items such as aluminum beverage cans by incorporating a redemption center into this facility to encourage more diversion. We firmly believe that this option and additional education and promotion will accomplish the same goals for that particular commodity, and believe that a "per item" deposit, either at our facility or another redemption center, would adversely affect our operation and the revenue generated from it. If we were selected as the "redemption center" for this beverage recycling program, we believe that the end result would be "forced acceptance" of materials such as aseptic containers, which the organization has stated we are interested in pursuing on our "own time and pace," not at the insistence of another organization or legislation.

Lastly, the undue hardship or cost that would be placed on the consumer to first pay the deposit, and then deliver the material back to a central location for a refund should be considered. Items such as reverse vending machines in metropolitan areas seem to be a good way to process these returns, but the same machines in a primarily rural area such as ours will not be widely utilized because of cost and distance to population areas. The current system works. Changes can be made to bolster the success of local recycling programs without forcing another new and burdensome system on the consumers who will pay for the program.

Please consider these points and closely study the upcoming cost benefit analysis. We believe that the system proposed has far too many unanswered questions and flaws to be fairly evaluated for passage by the legislature. We have a well established recycling program here in our area and throughout the State. Yes, we can improve, but we believe the "recycling refund program" is the wrong avenue to accomplish this change.

Sincerely,

Brian Sams -Redwood County Recycling Coordinator

C.C.- Bob Fox - Chair-Redwood/Renville Regional Solid Waste Authority

C.C. - Senator Gary Dahms

C.C. - Representative Paul Torkelson