

## Report Responsiveness Summary

### To Comments on the 2025 Biennial Report on Solid Waste 10 V.S.A. §6604(b)

On November 15, 2024, the Agency of Natural Resources (ANR), Department of Environmental Conservation (DEC) posted the Draft 2025 Biennial Report on Solid Waste (the Report) on its website for 45-day public comment period. This Report is submitted in compliance with 10 V.S.A. §6604(b), by which the Vermont General Assembly charged the Secretary of the ANR with submitting a report regarding the volume, amount, and toxicity of Vermont's solid waste stream. In making recommendations, the Secretary is directed to consider both legislative and voluntary mechanisms for reducing waste. ANR received one set of comments, from the Solid Waste Alliance Communities.

**1) COMMENT:** Under EPR for HHW, I'd like to see something in there that reflects the astronomical costs SWMEs are paying for hazardous waste collections and the financial burden this will help to eliminate from the SWMEs.

**RESPONSE:** The following sentence was added “[the law] was created to help alleviate municipalities’ financial burden”

**2) COMMENT:** Pesticides are not mentioned here at all. Currently, SWMEs are receiving very little compensation from the Department of Ag grants to cover the costs of pesticide collection. The EPR law does not include pesticides. This issue really needs to be addressed.

**RESPONSE:** The following sentence was added: “the law does not address pesticides, which municipalities mention frequently as a costly and difficult to manage waste material.”

**3) COMMENT:** I don't think the paragraph on tires may accurately reflect the illegal disposal situation in Vermont. The Vermont Product Stewardship Council is working towards EPR legislation on tires. Data is sparse for the initiative and could use some support to collect additional data. We recently discovered that not all towns report tires found on the roadside either through Re-trac or if they are Green Up tires, they don't all report to Green Up. I'd also like to see tires in that area to be delineated either in number of tires or number of tons. It is hard to grasp what's being said by comparing the number of tires to the number of tons of tires.

**RESPONSE:** The estimates of total scrap tires generated and tires collected through facilities were both removed because they added more confusion than value. The paragraph was rearranged to emphasize the issues of poor recycling markets, legacy piles, and illegal dumping.