



February 26, 2020

The Honorable Kumar P. Barve, Chair
House Environment and Transportation Committee
House Office Building, Room 251
6 Bladen St., Annapolis, MD 21401

Oppose: HB 988 – Business Recycling Reporting Requirements

Dear Chairman, Barve and Committee Members:

The NAIOP Maryland Chapters, representing more than 700 companies that develop, and own commercial, industrial and mixed-use real estate oppose HB 988, Business Recycling Reporting Requirements.

Current law authorizes local governments to require reporting by businesses and residents. HB 988 would remove this local option and require that all commercial and multifamily buildings in the state provide an annual report on the amount and weight of solid waste and the amount of recyclable material generated by the business.

The sorting and weighing requirement would be difficult and time consuming for building owners to complete on-site. The mandate would apply to commercial building types that are not required to recycle and would force businesses to generate data that was not sought by local decision-makers, and therefore may never be used.

During the 2019 session, NAIOP actively worked to pass Senate Bill 370 which requires recycling in large office buildings. The bill directs local governments to update their solid waste plans to implement the change. As those plans are revised, local governments will have the opportunity, using existing authority, to require reporting.

At that time, local regulators and stakeholders will determine the level of accuracy required and consider the trade-offs between completeness on the one hand and the cost of implementation on the other. Some will require reporting some will use surveys some will continue to estimate the annual amount of waste and recycling using per capita rates of waste generation.

As commercial recycling matures, information may be naturally generated. When materials find markets, there will be a record of a transaction and a business case to absorb the cost and administrative responsibilities of capturing that transaction.

We do not see any policy reason for the state to override local discretion and mandate reporting on solid waste and recycling materials.

For these reasons, NAIOP respectfully requests your unfavorable report on House Bill 988.

Sincerely,

Tom Ballentine, Vice President for Policy
NAIOP Maryland Chapters -*The Association for Commercial Real Estate*

cc: House Environment and Transportation Committee Members
Nick Manis – Manis, Canning Assoc.