



TESTIMONY OF THE  
NORTH AMERICAN INSULATION  
MANUFACTURERS ASSOCIATION (NAIMA)  
ON MARYLAND HOUSE BILL 1239

My name is Angus Crane. I am executive Vice President and General Counsel for the North American Insulation Manufacturers Association (“NAIMA”). NAIMA is the trade association for manufacturers of fiber glass and mineral wool insulation. NAIMA greatly appreciates the opportunity to submit comments on this proposed legislation.

The fiber glass insulation industry is the second largest users of glass cullet in North America. U.S. manufacturers used 4.1 billion pounds of recycled glass in the production of residential, commercial, and industrial thermal and acoustical insulation in 2019 and 2020. NAIMA Canada members together used 633 million pounds of recycled glass in the production of insulation. However, to be usable, that recycled glass has to meet quality standards that allow it to be used without damaging furnaces or causing environmental permits to be exceeded. The fiber glass industry is tremendously proud of the substantial use of recycled content in the production of energy saving insulation products. These products reduce building energy use and decrease our carbon footprint. Over the long term, the fiber glass insulation industry expects to continue using substantial amounts of recycled glass.

The industry could use more glass cullet as its advantages are significant and many. The use of glass cullet reduced the energy needed to produce our fiber glass insulation products. The recycled glass is less corrosive than sand, so the more glass cullet we use, the longer our furnaces are preserved. These are significant and weight motivations to use and increase our use of glass cullet. The industry needs legislative incentives to encourage the use of glass cullet.

We are thwarted in our search for quality glass cullet by municipalities and local governments who cut glass out of the recycling stream. The fiber glass industry has no footprint in the State of Maryland, but if we did, we would be frustrated with the lack of glass recycling facilities in the State of Maryland. There are more constructive ways Maryland could be facilitating and increasing the use of glass cullet than imposing a specific recycled content mandate on fiber glass.

The State of California has a mandate of recycled content. The glass industry willingly and readily cooperated with this legislative measure, which has been in place for well over 25 years. California recognized that the glass cullet supply chain has fluctuations and is not always steady and reliable. Therefore, the state allows for the fiber glass insulation industry to rely on an annual average of recycled content. This California legislation also allows for lifting of the requirement when the glass cullet supply is not reliable.

Therefore, NAIMA urges the State of Maryland to recognize these basic facts about glass cullet supply and afford the fiber glass insulation manufacturers the same flexibility as has been given to us by the State of California – an annual average and an exemption from the mandate if the glass cullet supply chain is interrupted.