

**Maryland-Delaware Solid Waste Association**

a chapter of the

**National  
Waste & Recycling  
Association<sup>SM</sup>**

Collect. Recycle. Innovate.

TO: The Honorable Kumar P. Barve, Chair  
Members, House Environment and Transportation Committee  
The Honorable Malcolm Augustine

FROM: Pamela Metz Kasemeyer  
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DATE: February 9, 2023

RE: **OPPOSE UNLESS AMENDED** – House Bill 230 – *Department of the Environment – Zero-Emission Medium- and Heavy-Duty Vehicles – Regulations (Clean Trucks Act of 2023)*

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The Maryland Delaware Solid Waste Association (MDSWA), a chapter of the National Waste and Recycling Association, is a trade association representing the private solid waste industry in the State of Maryland. Its membership includes hauling and collection companies, processing and recycling facilities, transfer stations, and disposal facilities. MDSWA and its members **oppose** *House Bill 230: Department of the Environment – Zero-Emission Medium- and Heavy-Duty Vehicles – Regulations (Clean Trucks Act of 2023)*, **unless the legislation is amended.**

Our member companies include waste and recycling haulers with large fleets of hauling vehicles. Especially given our role in promoting recycling and reducing waste, we are generally supportive of efforts to promote sustainability and reduce emissions within our industry. Our concerns with the bill, as drafted, are practical in nature – specifically the cost, availability, infrastructure, and suitability of electric hauling vehicles. First, the cost of electric waste hauling vehicles is significantly more than a traditional vehicle, imposing a significant burden on our member companies that could result in increased rates. Second, while some manufacturers have started to make electric vehicles, they are not yet widely available in the market, making compliance with a mandate a practical difficulty. Third, it is not yet clear whether electric waste hauling vehicles have the range to handle our typical collection routes, and the infrastructure for charging these vehicles is not fully developed and would be another source of substantial additional cost. MDSWA would support an amendment to require a needs assessment on key

issues of cost, infrastructure, and availability, and to delay implementation until certain criteria established by the needs assessment is satisfied. Adding such an amendment would make this proposal more practical to the waste and recycling hauler industry.

In summary, while the industry is fully supportive of reducing emissions and improving the efficiency of waste hauling vehicles, this legislation creates significant challenges for our members, making compliance an impracticality.

We request an unfavorable report, unless amended as described in this letter.