



Recycled Materials
Association

Recycled Materials Association (ReMA)

Position: Unfavorable

Bill: HB 1100 – Telecommunications Infrastructure – Protections

Committee: House Economic Matters Committee

Dear Chair Valderrama and Members of the Economic Matters Committee:

The Recycled Materials Association (ReMA) respectfully submits this testimony in opposition to House Bill 1100. ReMA represents member companies across Maryland engaged in the responsible collection, processing, and recycling of metals and other materials that support domestic manufacturing supply chains, environmental sustainability, and local economic activity. Our members operate under comprehensive state licensing, recordkeeping, and reporting requirements designed to promote transparency and support law enforcement efforts to deter theft.

HB 1100 would introduce requirements that are largely duplicative of existing Maryland regulatory frameworks governing scrap metal and used article transactions while creating new compliance challenges for regulated recycling businesses. At the same time, the bill proposes a broad and unclear definition of “telecommunications equipment” that does not provide sufficient guidance to purchasers regarding what materials would fall within scope. This lack of clarity raises practical concerns for processors attempting to distinguish telecommunications-specific items from materials commonly used across multiple industries.

While ReMA would not oppose continued discussion of telecommunications infrastructure protections, any approach should provide clear and workable parameters for regulated businesses. As drafted, the bill risks sweeping widely used recyclable materials into regulatory scope by default, creating uncertainty and potential operational impacts for companies acting in good faith under established compliance practices.

The legislation also incorporates concepts derived from provisions originally developed for historical markers and plaques, including a blanket holding requirement applicable to telecommunications equipment. That framework was designed for a distinct, limited context and does not reflect the broad and unclear telecommunications equipment definition, the overlapping requirements for scrap metal and used articles that HB 1100 also seeks to apply, or the operational realities of high-volume recycling facilities already subject to robust transaction documentation, reporting, and law enforcement cooperation requirements. Imposing an automatic holding period under these circumstances would create additional burden while duplicating tools already available to law enforcement through existing targeted hold mechanisms.

ReMA shares the Committee’s goal of preventing telecommunications infrastructure theft and remains committed to constructive engagement with communications providers and other stakeholders. Any legislative solution should prioritize definitional clarity, alignment with

existing regulatory structures, and enhanced enforcement resources rather than layering additional mandates onto compliant recycling operations.

For these reasons, ReMA respectfully requests an unfavorable report on HB 1100. We appreciate the opportunity to provide input and stand ready to participate in further stakeholder discussions.

Sincerely,
Recycled Materials Association (ReMA)