



Virginia Recycling Association  
P.O. Box 2107  
Midlothian, VA 23113  
www.vrarecycles.org  
1-804-302-4231

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September 2, 2008

Mr. Philip A. Leone, Director  
Joint Legislative Audit and Review Commission  
General Assembly Building, Suite 1100  
Capitol Square  
Richmond, VA 23219

Dear Mr. Leone:

Thank you for the opportunity to review the exposure draft entitled *Review of Virginia's Waste Reduction Efforts* in response to Senate Joint Resolution 361 (2007). It has been a pleasure to work with Eric Messick, Chief Legislative Analyst and Project Leader, and we greatly appreciate the staff's effort to examine and report on such a broad issue.

The Virginia Recycling Association (VRA) is the only statewide, non-profit organization dedicated to expanding recycling in Virginia. The VRA is the Commonwealth's leading organization committed to the goal of promoting recycling as the fundamental part of conserving resources and reducing solid waste. Our membership is diverse – citizens, local government recycling coordinators, and business and industry professionals. We make possible the gathering and exchange of information, knowledge and ideas relating to recycling. Your report is most helpful in educating Virginia's elected officials about the many needs in this area.

The report's findings are detailed and will provoke much discussion regarding Virginia's waste reduction and recycling efforts. The study sites concerns and factors leading to the need for review and recommendations for long-term waste minimization goals and strategies. The VRA supports the report's recommendations, and offers the following specific comments:

*Non-general fund sources.* Several of the states surveyed by JLARC staff show their strong support for waste reduction and recycling by dedicating non-general funding sources for these programs. With additional resources, Virginia's Departments of Education (DOE), Environmental Quality (DEQ), and General Services (DGS) could develop more guidance and assistance to local government programs. At the State level, waste reduction activities are supported by only three full-time equivalents at DEQ and one unfunded position at DGS, as described in the JLARC report, and their time is largely occupied with tires, batteries, and the recycling rate reports. Additional resources would help create more effective programs. The 2009 General Assembly Session may wish to consider creating non-general fund sources and dedicating revenue generated from such sources to current and new waste reduction and recycling efforts. In a related matter, the VRA agrees with the finding of the JLARC report that the current Litter Prevention and Recycling Fund system in which the two activities compete against one another for funding is inherently flawed. They are both worthwhile and valuable efforts which involve unique activities working toward the goal of environmental quality. They need separate and adequate funding.

*The VRA is a 501 (c)(3) non-profit and strives to educate and promote effective recycling and waste reduction methods.*

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- ◆ *Adopt specific waste reduction goals.* Our neighboring states of North Carolina and West Virginia evaluate their solid waste streams and include goals for the reduction of municipal solid waste on a per capita basis. Solid waste reduction goals could include reduction at the source, and be determined by local government units that prepare plans and report to the State. Some states view waste reduction goals as more effective measurements than recycling rates for waste reduction.
- ◆ *Provide real assistance with market development.* The need to develop markets and businesses using recycled materials as “feed stock” has been recognized in Virginia since 1989. However, State assistance and resources have been very limited. The primary example is the complete absence of any resources for the Virginia Recycling Markets Development Council. As described in the JLARC report, North Carolina’s Recycling Business Assistance Center (RBAC) and Pennsylvania’s Recycling Markets Center (RMC) support and grow their states’ recycling industries through financing, grants, loans, recycling tax credits, technical assistance and other financing resources and partnerships. For example: in May 2008, financial support furnished by the Pennsylvania Department of Environmental Protection’s Recycling Markets Infrastructure Development Grant awarded \$500,000 to LCL Industries, Inc., a new women-owned enterprise that will reuse more than 30,000 tons of recycled glass per year in Pennsylvania and create approximately 25 jobs.
- ◆ *Develop waste reduction activities and recycling programs in public schools.* Virginia’s DOE should develop guidelines and promote waste reduction and recycling activities and programs in public schools pursuant to Code of Virginia §10.1-1425.9. DOE should consult and work with local government recycling coordinators and the VRA. In 2008, the VRA developed and conducted three School Recycling Workshops that were free of charge and open to anyone. The significant number of attendees, most of who do not work in the recycling industry, shows the widespread enthusiasm for recycling in our schools.

On behalf of the Virginia Recycling Association, we commend the General Assembly for charging JLARC to undertake this study. The VRA is ready to work with all interested parties to further explore and assist whatever options the General Assembly and the Governor believe appropriate in response to this report. Again, thank you for the opportunity to review and comment on the draft.

Sincerely,

Kate Sicola, President

cc: VRA Board of Directors