



Vermeer
1210 Vermeer Road East
Pella, IA 50219
www.vermeer.com

May 11, 2012

Re: Bill HB4265
Bill HB4266

Dear Senator

On behalf of Vermeer Corporation, an equipment manufacturer involved in the bio-mass and composting markets, this letter expresses our concerns about the current contents of proposed HB4265 and HB4266. In coordination with our authorized dealer, Vermeer Midwest having its principal offices located in Jackson, Michigan, we have reviewed and discussed HB4265 and HB4266 at length. In addition, we have reviewed and discussed these House Bills with several of registered compost facility owners in Michigan, a small portion of the 116 registered compost facilities in the State of Michigan.

We are very concerned with the bills being proposed and strongly request that you oppose these bills for the following reasons.

1. Landfills are not the responsible place for disposal of yard trimmings, or any type of bio-mass for that matter. Science has proven that composting of yard trimmings is the better method of the two choices given. If done properly, composting of yard waste allows a faster and more efficient breakdown of carbon and nitrogen based materials. Landfills do not offer an oxygen level in high enough quantity for proper breakdown of this material, thus increasing the landfill's overall daily tonnage applied ratio and decreasing the overall life expectancy/capacity of the landfills. Increasing the landfill revenue is not the right answer to regulating the composting industry; it is merely a temporary solution that does not address the root cause of the problem at hand.

Various studies indicate that 90% of the yard trimming material is made up of lignin, an organic substance that, with cellulose, forms the chief part of woody tissue. Less than 30% of this lignin will decompose in a landfill environment. As currently proposed, if 70% of the yard trimmings do not decompose in your landfills, the result will quickly be shown in the lack of capacity and inefficiencies at your landfills.

Furthermore, the methane gas that is created in the landfills will not have a 100% capture ratio, and as I am sure you already know, methane gas released into the earth's atmosphere is upwards of 30 times more harmful than that of carbon

dioxide (that is what is created in the composting process at a proper run facility). The US EPA has identified landfills as the single largest source of methane (CH₄), a potent greenhouse gas that is 23 times more efficient at trapping heat than carbon dioxide (CO₂). Landfills contribute approximately 34% of all man-made methane released to the atmosphere in the US (USEPA, 2007).

Also worth mentioning is land and water quality. Compost is used as an alternative to land applied chemical based fertilizers. Without compost being produced (due to closures of facilities in Michigan if you pass these bills), farmers will have no other choice but to use chemicals on their fields. By eliminating these choices, this will increase the potential for water source/water table contamination due to flooding and run off into your streams, rivers and lakes. I believe Michigan prides itself in being a Natural Resource state for public enjoyment/use and something we feel you should strongly consider as a negative result of these bills.

2. Both public and private sectors have spent considerable time and money over many years (10-20 years at a minimum) to increase composting technology, education, awareness. This education effort has improved and benefited our lives, communities, agriculture industries, business, and many other items in the world in which we live. If these bills pass, we feel Michigan is taking a step backwards in time, repealing a piece of legislation that has been in place for nearly 18 years.
3. Sustainable employment or job creation must not have been considered when writing these proposed bills. Many small businesses will suffer considerably, if not discontinue to be viable businesses altogether, in exchange for what -- allow increased revenue at the tipping gates of the landfills? The infrastructure that is in place currently in Michigan to transport and process solid waste at the curb will be able to handle yard trimming collection as well. For these reasons, you can see why Vermeer does not believe that job creation was considered during the drafting of these bills. However, it is very evident that the loss of jobs that will be eminent should these bills be passed. With the passing of these bills, you are not only risking the jobs at your composting facilities located in Michigan, but these proposed bills will also affect other jobs throughout the United States.

Part of our business model at Vermeer Corporation in Pella, Iowa caters to the composting market. Vermeer manufactures a variety of products that work in the composting facilities from the time the raw material is collected at the compost yard, throughout the composting process to the point when the finished product is ready for market. The proposed bills will also affect Vermeer Midwest-Michigan, a long standing local Michigan business with offices in Jackson and Marne. As Vermeer Corporation relies on the manufacturing of said products, Vermeer

Midwest relies on being able to sell and service these products in their local markets, to your 116 registered compost facilities in Michigan.

4. Increased influx of compostable materials. Today you are looking at allowing yard trimmings from Michigan residents to go back in to the landfills. As we understand it, Michigan also allows landfill material to come in from Canada. It is also our understanding that the tipping fees in Canada are much higher than those charged in Michigan, which will naturally encourage waste haulers from Canada to bring in the blended material of household waste along with yard trimmings. This again speaks to the annual volume your facilities will receive, thus reducing overall landfill life expectancy. Today it is Michigan, tomorrow Canada, who is next? Indiana, Illinois, Ohio???
5. Education. Everywhere we turn and look today, the nation has a spreading movement, as it should, to "Reduce, Reuse and Recycle". By approving these bills, what does that say to our children who are learning in the school systems to recycle everything they possible can? Some schools have gone as far as to separate lunch room materials for those products that should go to the landfill and those that can be recycled. If these proposed bills are passed, today we will start with yard trimmings going back into landfills -- what will you send to the landfills tomorrow or in years to come?

In closing, Vermeer Corporation, as well as Vermeer Midwest, hope that you realize why the passing of HB4265 and HB4266 should be strongly opposed. It would be a travesty to the environment and economy if these two bills passed. The financial gain to the landfill tipping gates does not outweigh the environmental impact or the loss of local and national jobs. I would also like to think this is not the impression Michigan would want to leave on the rest of the nation that is so focused on recycling and reducing greenhouse gas emissions.

Sincerely,



Mike Byram, P.E., M.B.A.
Vice President of Environmental Solutions