



## Composting Association of Vermont

[www.compostingvermont.org](http://www.compostingvermont.org)

*Recycle Waste & Restore Soils for Healthy Plants, People, & Places*

---

July 31, 2007

To: Agency of Natural Resources  
George Crombie, Agency Secretary

From: Composting Association of Vermont  
Robert L. Foster, President

RE: ANR Reorganization

The Composting Association of Vermont appreciates the Agency of Natural Resources efforts to 'get ahead of the curve' and prepare to regulate and permit waste reduction in environmentally and economically sustainable ways. A shift in focus, driven by a zero waste vision, will also require mechanisms to reclassify certain 'solid waste' as 'resources' in step with changes in the marketplace.

As ANR reorganizes, the Composting Association of Vermont respectfully requests that the Agency consider how to incorporate the following:

- Become an aggressive advocate for waste reduction and resource recovery.
- Provide more leadership for organics recycling, waste reduction and resource recovery. For example: establish internal initiatives that create positive economic conditions through state level efforts such as mandated diversion of organic materials in all state institutions; this would help to create economies of scale and service demands that would stimulate private haulers and composters to expand service areas and grow new programs.
- Ensure a viable and ecologically sound composting industry that can play a significant role in waste reduction by managing the organic residuals produced in the state.
- Advance the production and use of compost as a positive response to address critical natural resource management concerns: soil health and security, and water quality.
- Have regulatory and permitting consistency between agencies with respect to composting; and have compost production part of the farming definition in Act 250.

- Establish clear goals for increasing organics recycling and develop a strategy and timeline to achieve them. Include stakeholders in this process.
- Look outside the U.S. (eg. Europe) for regulatory models to permit the handling/recycling of organics.
- Provide a process for carbon management that addresses both soil security and energy concerns.
- Establish a reclassification mechanism for types of solid waste that now, or in the future, can become recyclable resources (eg. biodegradable packaging).
- Support the production and use of compost through procurement policies that utilize Vermont products made with recovered resources, such as compost, for erosion control on highway projects.
- Consider market-based programs to discourage activities and products that produce waste and fund programs to create alternative approaches.
- Place an additional licensing fee/surcharge on the sale of commercial fertilizer for non-agricultural use as part of a water quality improvement and education plan. Use these funds to help farmers transition to compost-based soil building/management practices. (The Agency of Ag currently uses licensing fees to cover enforcement and regulation.)
- Create more economic incentives/support programs for the start-up of programs that will reduce waste and/or increase recycling activities.

Composting is an agricultural practice and is part of the biological cycle. Composting also has tremendous potential to mitigate farm-generated phosphorus in waterways.

Thank you for your consideration. We would welcome assisting however we can to ensure the sustainability of Vermont's agricultural soils, and statewide organics diversion and recycling. Please feel free to contact me (802.989.2771) or our Vice President, Tom Gilbert (802.472.5138).

