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To: House Committee on Energy, Environment, and Water

The Center for Earth Leadership opposes LC0156 for the following reasons:

**1. This bill changes Oregon's 30-year-old reduce, reuse, recycle policy without justification.** It defines an energy recovery process as recycling. In the hierarchy, recycling is preferred over energy recovery for environmental reasons:

- It saves more energy (See Studies below)
- It saves more natural resources
- It creates less pollution

**2. Pyrolysis has significantly worse greenhouse gas impacts when compared to recycling plastic, and is even slightly worse than landfilling plastic.** See p. 5, "punchline #2" of research presented in Portland at the Association of Climate Change Officers meeting in October 2010, <http://www.accoonline.org/cccls/Waste2010/ACCO-CCLS-October2010-Session4-Skov-Slides.pdf>.

**3. Plastics pyrolysis is but one of many rapidly emerging waste-to-energy conversion technologies.** If the solid waste hierarchy is to be refined, research needs to be done to determine where each fits in the hierarchy in terms of energy and resource savings and pollution avoidance. The City of Portland, in its Climate Change Plan, also expressed a need for such research. It would be helpful if the legislature provided money for this research.

**4. Energy recovery facilities will compete with recycling.** Absent energy recovery facilities, as oil prices continue to rise, more types of plastic will be recycled. For example, deli trays and blister packs and yogurt/margarine tubs and lids are not currently recycled statewide but should be in the future. Even agricultural waste, such as greenhouse film, nursery pots, and irrigation tape, can be sold in recycling markets when the prices are up.

Once energy recovery plants have been built, they will require a certain volume of feedstock to pay back capital costs. Therefore, they could offer prices that divert recyclable plastics to energy recovery.

**5. Plastics pyrolysis may increase air toxics.** If PVC is part of the plastic mix, hydrochloric acid and other chlorinated hydrocarbons could present significant health concerns.

**6. We should not allow the chemistry industry to alter state policy for its own private benefit.**

#### Studies

- An analysis by DEQ of data available from Agilyx and other sources indicates that pyrolysis by Agilyx would save about 24 million BTUs per ton of plastic, which is less than half as much energy as recycling would save.

- A Tellus Institute report commissioned by the Massachusetts Department of Environmental Protection in 2008 showed that recycling saves over three times as much energy as pyrolysis facilities generate. Gasification/pyrolysis facilities treating municipal solid waste release almost 18 times more CO<sub>2</sub> than recycling. For plastics the figure would be even higher, <http://www.no-burn.org/article.php?id=610>
- A 2007 environmental benefits study done for Metro found that the environmental value of all material recovery (excluding incineration) was \$120/ton. In contrast, the value from recycling and composting (excluding energy recovery) was \$220/ton, [http://media.oregonlive.com/environment\\_impact/other/ApothekerSeries.pdf](http://media.oregonlive.com/environment_impact/other/ApothekerSeries.pdf), p. 16.