



OREGON REFUSE & RECYCLING ASSOCIATION

January 30, 2025

Testimony by Craig Campbell, Governmental Affairs Director, Oregon Refuse and Recycling Association, before the House Committee on Climate, Energy, and Environment.

Chair Lively, Vice Chair Gamba, Vice Chair Levy, Members of the Committee

ORRA is the statewide trade association representing over 90 solid waste management companies in Oregon. Our regular members collect and process most of Oregon's residential and commercial refuse and recyclables, and operate material recovery facilities, compost facilities, and many of Oregon's municipal solid waste transfer stations and landfills. Additionally, ORRA has over 50 associate members that provide goods and services to our members, including various types of trucks needed for solid waste and recycling collection services.

My comments today will be brief. Let me begin by stating that ORRA supports efforts to reduce emissions that adversely impact climate change. However, the role of solid waste removal is one that cannot be safely disrupted, and we will raise concerns when there is a likelihood that policy will adversely impact the delivery of solid waste collection services in Oregon.

Regarding the Advanced Clean Trucks Act (ACT), the Environmental Quality Commission (EQC) was considering adopting rules to bring Oregon into compliance with ACT regulations beginning in 2025. ORRA worked with Department of Environmental Quality (DEQ) staff and specifically requested an exception to delay the start of the Heavy-Duty Low NOx Omnibus Rule for solid waste disposal vehicles until 2026. This request was due to our members' inability to acquire the highly customized trucks required to meet their service demands and to allow heavy vehicle dealers to meet their requirements under the ACT. However, DEQ recommended that the EQC go further and delay the adoption of ACT requirements for all heavy vehicles until 2026, which the EQC adopted.

ORRA noted concerns then and continues to have concerns about the lack of availability of waste collection vehicles with the implementation of the ACT requirement beginning in 2026. We are prepared to request a further delay through rule by the EQC until 2027 for solid waste collection vehicles. However, HB 3119, by statutorily directing that delay, would address ORRA's concerns that our members would be unable to acquire the highly customized trucks required to meet their operational responsibilities.

Thank you for your time and attention.