



New York Farm Bureau
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MEMORANDUM OF SUPPORT

Senate Bill 4974 Senator Metzger/ Assembly Bill 7423 Assemblywoman Lupardo

AN ACT TO AMEND THE AGRICULTURE AND MARKETS LAW AND THE ENVIRONMENTAL CONSERVATION LAW, IN RELATION TO THE REMOVAL AND REMEDIATION OF WASTE TIRES

Date: 5/3/2019

New York Farm Bureau, the state's largest agricultural advocacy organization, respectfully requests your support for this legislation. If enacted this legislation would develop a plan and provide assistance to farmers for the remediation and removal of waste tires used on farm.

In 2017, New York State Department of Environmental Conservation finalized its Solid Waste Management Regulations, commonly referred to as Part 360. Part of these regulations applied to "waste tires" on farms. Aimed to address concerns around tires being breeding grounds for mosquitos, the Department enacted regulations that would require farmers to halve and drill holes in tires to prevent the retention of water. Unfortunately, most tires in the United States are radial-ply tires that contain metal wires that if drilled could contaminate feed and pose a health hazard to cows.

Further, this is difficult and dangerous work particularly on the number of tires needed on a farm. Waste tires are primarily used on farms to secure tarpaulins on bunk silos to ensure that the feed is protected and not allowed to spoil. It is not uncommon for a dairy farm to have thousands of waste tires in order to secure their bunk silos.

Complying with this regulation has been difficult for farms as recycling of tires can be cost-prohibitive and there are no effective alternatives to using tires on bunk silos. New York Farm Bureau has been working with the Department to secure a Beneficial Use Determination to provide farmers with the time necessary to comply. Unfortunately, this is a complicated issue and farmers need a plan to move forward and this legislation will help provide not only financial resources but a plan to find alternatives and how to get rid of the large quantities of tires currently on farms.

For these reasons, New York Farm Bureau requests your support of this legislation. Thank you for your time and consideration of these comments.