



MAINE AUTO RECYCLERS ASSOCIATION

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To: Maine Board of Environmental Protection

August 25, 2023

Re: California Clean Trucks Rule

A member of our Association—Pietro Romano of White and Bradstreet, Augusta, testified at the August 17 in opposition to adoption of the above rule.

On behalf of our Association, I am following up with the following observations:

Recycling of vehicles is a key component of our transportation-based economy. Recyclers provide to garages and individual vehicle owners the parts necessary to keep vehicles on the road as they get older. While dealers also provide parts, repairing a vehicle “at the dealer” is often beyond the budget of many Mainers. In addition, dealers may not have available, or be able to obtain, parts necessary for older model vehicles. Recyclers, on the other hand, through their networks, local auctions and, in recent years online auctions (which take place daily on a national basis) readily access any necessary part.

Truck recycling presents special challenges, requiring expensive equipment. White and Bradstreet, which has been in business since 1952, is at this time the only Maine firm which specializes in truck recycling.

Because of their huge size and fire hazard, handling of truck batteries requires that the recycler make major new investments in their building and equipment. There is no firm in Maine poised to undertake such investment. Such investment will assuredly be made as the free market shows that significant numbers of EV trucks are being operated in Maine— trucks which at some point will need to be recycled or need recycled parts.

The necessary investment will NOT be made, however, in response to the proposed California rule, which will have unpredictable results.

William Bell, Executive Director