

**ASTSWMO POSITION PAPER
E-MANIFEST SYSTEM DEVELOPMENT FUNDING**

Background

The Association of State and Territorial Solid Waste Management Officials (ASTSWMO) strongly supports the development of the e-Manifest system that is currently underway. We and our member States, Territories and the District of Columbia (States) have supported this system since 2004 because it has the potential to provide the States, the federal government, and regulated industry with significant savings of time and resources as well as better and more efficient delivery of information. The system also can also provide real-time tracking of hazardous waste on our nation's roads and multi-State data will be available to all users.

Issue

We are very concerned because the funding currently allocated and requested to develop the program is functionally inadequate. EPA estimates that system development and roll-out will cost between \$16 million and \$21 million. However, the original statute enabling the e-Manifest system (S.710, Public Law 112-195) only authorized \$2 million per year for three years – or a total of \$6 million. Despite repeated feedback from EPA, the States, and industry that this amount was vastly inadequate, it was unchanged in the final legislation. The President's budget for FY2014 requests a total of \$4.3 million (\$2 million from EPA's Resource Conservation and Recovery Act budget and \$2.3 from EPA's e-enterprise budget) as first-year funding to begin building the system. This amount is an improvement if it can be sustained for several years, but it is still too small. The amount proposed in the President's budget request will make system development and roll-out a four to five year process, greatly exceeding the law's goal to bring the system on-line by the end of 2015.

Position

The end result of an underfunded system will be to delay or negate monetary and resource savings by EPA, the States, and industry. It may also result in even higher project development and implementation costs. For timely system development, we urge that the President's request be doubled, increasing 2014 funding to between \$8 million and \$9 million. If an equivalent amount is also allocated in FY2015, it will allow system implementation in about two years. Clearly, this increased funding should not be allowed to affect State and Tribal Assistance Grant (STAG) funding to States.

It is our belief that this higher level of investment must be accomplished so that the savings projected for EPA, the States, and industry can be quickly achieved. Once the system is operational, funding will no longer be necessary as the fees authorized in the legislation will offset continuing costs.

Approved by the ASTSWMO Board of Directors on October 28, 2013.