

Thank you for the opportunity to submit written comments on the Scoping Plan draft. I am Chair of the Public Policy Committee of Zero Waste Capital District.

The Scoping Plan draft is a very good starting point and we applaud the work you have done. We know the faster we can move to full electrification the better it will be for our collective health and for the economy. These comments will focus on areas of the plan that need to be strengthened.

* Some wastes have no beneficial use due to toxicity. This is true for sewage sludge (aka bio-solids)that is contaminated with PFAS. Therefore, sewage sludge must never be mixed and co-digested with other organics for the purpose of creating compost to be applied to land for farming gardening or landscaping. In Maine high PFAS concentrations have been found on farms and in farm wells as a result of sewage sludge being land applied as fertilizer. Tragically, as a result, some farmers can no longer produce crops or livestock products for market. The Maine legislature is considering establishing a $100 million fund to compensate affected farmers.
* DEC should be directed to conduct a study comparing single stream and dual stream recycling, documenting contamination rates and marketability of different types of recycling.
* The collection of organic waste (food scraps and yard waste) must be implemented at the household level in order to keep all food scraps and yard waste out of landfills. Organics must not be allowed to be put in landfills.
* The bottle redemption program must be expanded to more glass and plastic containers with at least an 100% increase in the refund.
* A per ton surcharge on waste is a tried and true approach to creating a funding stream for waste reduction, reuse, and recycling infrastructure and programs. These fees should be deposited in a dedicated fund, to be managed by designated state employees, who would be responsible for funding waste reduction, reuse and recycling programs and whose salaries it would fund.
* Biogas captured from waste should be only used for power on site and there should be no funding to build transmission infrastructure for biogas.
* Waste incineration is incompatible with climate action. It is unhealthy, and inefficient. Incinerating waste for energy should never be considered green or sustainable or renewable energy. The incinerators in New York need to be rapidly decommissioned.
* The best way to handle waste is to eliminate it at the source. The production of single use, non-recyclable products must be rapidly phased out.
* Failure to keep toxic substances out of products and packaging will continue the assaults on our health. This threatens our food supply, water and land resources. For example, when plastic is recycled, toxic additives in the plastics will be recycled into new products. Eliminating such substances will facilitate recycling.
* The final Scoping Plan must specify the level of mandated reductions in greenhouse gas emissions and co-pollutants that each industry sector must achieve by 2050 and the other dates set forth in the CLCPA, as well as a timeline for achieving such reductions.
* The CLCPA seeks to address environmental injustice. In order to correct past wrongs, the Climate Plan must take into account the pollution and toxicity associated with different waste management methods. Otherwise, low income and people of color communities will continue to be over-burdened by waste facilities and their health and environmental impacts.
* There should be mandates for each sector that are legally enforceable against businesses and individuals and that specify targets for individual businesses when feasible.
* To prevent false solutions, the state must establish, if necessary by legislation, a system to fund reductions in greenhouse gas and co-pollutant emissions as well as the transition to a renewable energy economy.

Thank you for your attention to our comments and concerns.

Kurt Krumperman

Zero Waste Capital District Public Policy Committee Chair