

ANR's 2008 Solid Waste Report to the Legislature

Solid Waste Working Group – 6/23/08 Comments

The Solid Waste Working Group provided initial comments on ANR's 2008 solid waste report at their 6/23/08 meeting. ANR's report includes a vision and key features of the vision. These group's comments have been listed under relevant key features of the vision.

1. Focus on Sustainable Materials Management

2. Share Responsibility

- Product Stewardship and EPR are a means to get where we want to go.

3. Establish Statewide Waste Generation Goal:

- Do we want a waste generation limit? Will that be a penalty?
- Diversion or generation rates should be a goal and not a mandate.

4. More Integrated State-wide Strategies and Implementation

- Needs an implementation plan – The purpose of report is broadly based. In order to move it along have to get into the steps what have to do. The waste prevention report should be incorporated. The report needs examples.
- Lack of state leadership, ANR and others.
- Lack of funding.
- The state plan and implementation should be state wide. Example – Everyone should do recycling the same way. It was noted that population densities vary around the state and what may work economically some areas might not in other areas.
- Consolidation of planning entities is implied in the report. At this point there are independent towns that don't yet have an approved SWIP. At some point this becomes unmanageable. An example of realignment for districts could be on a county basis.
- Need to study and understand what businesses already do such as self haul of recyclables. Can or will businesses provide this information?
- Infrastructure cost is expensive. There are only a few options - spend less, create new revenue or set \$ aside from somewhere else.
- The fee structure is based on volume. If the volume goes down so do the revenues.
- The report should address in more detail new ways for infrastructure to work including costs and changes in infrastructure. There are inherent problems with 43 planning entities and 12 districts, inflexible state statutes and rules, and current funding mechanisms that with success will decrease in amount of \$. There is no incentive for districts to reduce waste. It is not in their best interest right now to turn that around. The way of thinking and way of funding has to be different.

5. Expand Current and Create New Partnerships:

- Lack of legislative support of solid waste priorities. Example: Districts have brought initiatives to the legislatures which were shot down because of ANR objections.
- Vermont can't act alone

6. Continue to Meet Ongoing Responsibilities:

- Need rules for anaerobic digestion, gasification and incineration.

7. Expand Criteria Used When Making Decisions

- The report failed to look at highest and best use. We need a methodology to evaluate the environmental impact. There is no good consistent system for evaluating the environmental benefit. Is energy, soils, jobs the highest and best use?
- There are new processing technologies that are not strictly incineration. The old plan said incineration is not a priority.
- How can we best maximize carbon credits and renewable energy credit? Bans could prevent ability to obtain these credits.
- We need to show Vermonters what the future environmental and economic impact is if this is not turned around. Vermonters aren't paying the true cost. We need to understand the true cost in today's dollars.
- Need to identify the environmental benefit for paying additional \$ for alternatives to disposal. Example – Additional cost associated with composting instead of disposal.
- True cost includes other measurement besides \$ cost such as quality of life, a secure food supply. Also life cycle analyses.
- The report doesn't address the necessary processes and science for landfills if don't achieve zero landfilling. What should the policies and practices be? Should they change from those of the past 20 years?
- Don't just write off the strengths identified in the report. These strengths need to be assessed. They can be improved upon. Example: While both landfills meet Vermont requirements but they don't meet NY state standards.
- The report identifies protection of public health as a strength. Whether this is a strength for Vermont depends on ones perspective. We don't necessarily understand the impacts to public health and the environment from various solid waste processes. Other states and countries are light years ahead of Vermont on this issue. Not comfortable making this statement with waste in general. Example – Composting and anaerobic digestion are now not allowed in California due to air emissions

8. Measure Progress Differently and Better

- How about using something like EPA gas trade offs.