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Comments on Draft 2020-2030 Solid Waste Master Plan to MassDEP

Thank you for envisioning and detailing a Zero Waste future for Massachusetts in this document. Many of the components that MassDEP is already engaged in provide important help to the SSRC's sixteen Member Municipalities in managing and improving their solid waste programs.

Here are my comments, organized by the sequence of the document:

- page 7, “**2030 Goals**”, 1. The disposal goal of 4 million tons per year by 2030 arbitrarily follows the timeline to the 2050 waste reduction goal of 90%. It would be more compelling if it were tied to our shrinking in-state capacity. If we were to aspire to reduce exports by half from current levels, that would bring the goal to about 3.9 million tons per year and have a clearer basis.
- page 10, “**Legislative Strategies**” The only approach that can be taken at the state level to address single use packaging is extended producer responsibility for packaging materials, crafted in such a way as to incentivize the minimization of material, the use of recyclable material, and the use of recycled content. Packaging and paper products should be added to the list of EPR products. Producers have much more influence on packaging waste than consumers.
Legislating recycling service requirements for waste haulers is an important initiative, and I am glad to see it in there.
- Page 10, “**MassDEP Regulatory and Assistance Strategies**” Add “and publicize” before “regulations to ban the disposal of mattresses and textile”. A textile waste ban would be an effective and easy way to reduce disposal tons, if it is widely known.
After “waste ban inspections”, add “and enforcement actions”. The inclusion of “generators” added to those subject to inspection is excellent.
- Page 14, “**Residential Waste Reduction**” Among the most helpful and impactful are the Municipal Assistance Coordinators, the Recycling Dividend Program, and the RecycleSmart program. These are crucial services. It is good that they are enshrined in this section.
- page 15, “**Policies and Regulations**” As noted under Legislative Strategies, the only approach

that can be taken at the state level to address single use packaging is extended producer responsibility for packaging materials, crafted in such a way as to incentivize the minimization of material, the use of recyclable material, and the use of recycled content. Packaging and paper products should be added to the list of EPR products.

- Page 22, “**Solid Waste Facility Oversight and Capacity Management**”, under “Oversee active solid waste, recycling and composting facilities”, “regulation changes” should include auditing and reporting of recyclable tonnages going into and out of material recovery facilities. This would provide transparency in commodity compositions for municipalities with single stream recycling programs, would reveal how well MRFs are able to sort incoming material, and would provide important data regarding the recovery of each type of recyclable commodity, especially in combination with the waste composition study data from the municipal waste combustors.

I appreciate the opportunity to provide input to this important document.

Sincerely,

A handwritten signature in cursive script, appearing to read "Claire L. Galkowski". The signature is fluid and extends to the right with a long, sweeping tail.

Claire L. Galkowski, Executive Director



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