

## CCSMM Comments

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To: DEEP RecyclingProgram

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Attached please find my CCSMM comments.

Sincerely,

Jennifer G. Kleindienst  
241 West St.  
Middletown, CT 06457

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Dear Connecticut Coalition for Sustainable Materials Management (CCSMM),

I submit public comments regarding Unit-Based Pricing (UBP)/Pay as You Throw (PAYT) below, as well as several comments about industrial-scale food waste disposal.

1. Are there any model programs, best practices, or innovative concepts that the Coalition should consider, that could provide a scalable solution in any of the Focus Areas, listed above? The Coalition is interested in hearing about approaches that are conceptual, implemented on a pilot basis, or implemented at scale, whether here in Connecticut or in other jurisdictions in the United States or other countries.  
In 2008, I lived in Wellington, New Zealand, where they had a highly successful PAYT (pay as you throw) program. I have not continued to follow this program but would recommend looking into it. Walpole, NH, a small town, also has a successful PAYT program. It is essential that any PAYT program is mandatory or else it cannot achieve success.
2. For any solution identified in Question 1, what are the barriers that need to be addressed in order to advance any of these solutions at scale in Connecticut? Are there different implementation considerations for full or partial “subscription” towns versus towns that provide for curbside collection of trash & recyclables? Is it necessary or beneficial for the solution to be implemented on a statewide, multi-town, or other regional basis, or can it be implemented successfully town-by-town?  
It is important to address what waste haulers will do with those not in compliance (ex: what if a bag of animal waste is thrown directly in a bin, or someone puts some trash in a PAYT bag and some in a regular trash bag). Will there be different responses based on the percentage of noncompliance? In Walpole, NH, they have both curbside collection (optional) and a self-service transfer station. All residents purchase PAYT bags at the transfer station or at several

locations in the town and must either a) bring trash in the PAYT bags to the transfer station or b) put trash in curbside containers in PAYT bags. Recyclable materials are exempt from PAYT and are handled as per usual. PAYT can be successfully implemented town-by-town.

3. For any solution identified in Question 1, please describe the types of implications or benefits that the solution provides with respect to sustainability-environmental benefits and reducing costs  
PAYT has been documented to significantly reduce waste and has the potential to reduce costs. When paying a flat fee for a container, as many Connecticut residents (including myself) currently do, there is no incentive to reduce trash. If I throw out one bag or 10 bags a week, my cost is the same. Switching to a PAYT system would directly incentivize reducing waste, which could in turn reduce costs. PAYT also has the potential to reduce costs for low-income residents.

4. Would you be interested or willing to present to the Coalition or a Coalition working group on solutions you've highlighted, or is there another speaker or organization that would be helpful for the Coalition to hear from on this topic?

I am passionate about PAYT but do not feel knowledgeable enough to present to the Coalition. I would recommend talking to EPA researchers who specialize in this area. The authors of this article ([citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.915.8702&rep=rep1&type=pdf](https://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.915.8702&rep=rep1&type=pdf)) may also be of help.

5. DEEP can play an important role in advancing sustainable materials management solutions, including: issuing RFPs for long-term energy contracts to support anaerobic digestion facilities; providing grants for collection trucks powered by compressed natural gas (CNG) or electricity through the Volkswagen settlement; employing different approaches to permitting innovative technologies; and streamlining permitting processes. Are there things that DEEP should do differently in its approach to any of the above roles/functions, that would better support sustainable materials management in Connecticut?

Support the creation of more anaerobic digestion AND composting facilities in Connecticut. Pre-pandemic, the issue of “compostable” dinnerware was becoming a waste disposal issue, as few locations in the state will accept these materials and they are not able to be composted through an anaerobic digestion process. In the throes of COVID, the volume of these materials has increased even more. Anaerobic digestion should certainly be expanded, but industrial composting must also be promoted to reduce waste.

Sincerely,

Jennifer G. Kleindienst

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