

## Comments to the CT DEEP regarding the Sustainable Materials Management initiative

KD

Kelley Dennings <kdenning@biologicaldiversity.org>

Thu 10/15/2020 11:53

To: DEEP RecyclingProgram

Response to CT about Sus Mat Mgt - 2020-10-15.docx

23 KB

The Center for Biological Diversity submits the following comments to the Connecticut Department of Energy and Environmental Protection regarding the Sustainable Materials Management initiative. See below and attached.

I have 15 years of experience working on recycling at the local, state and national levels as a community recycling coordinator, state recycling staff member and as a subject matter expert for two national non-profits. I currently work at the Center for Biological Diversity (the Center) - a national, nonprofit conservation organization with more than 1.7 million members and online activists dedicated to the protection of endangered species and wild places. We believe the health and well-being of humans is intrinsically linked to the health and well-being of nature. Thoughtful government programs can have an enormous impact on water, soil, climate, biodiversity, and the health of ecosystems.

First, I applaud the topics to which you are soliciting comments – unit-based pricing, organics, extended producer responsibility and recycling – however, this is no mention of reuse or waste prevention outside of food.

### BEYOND RECYCLING

We need to continue to invest in recycling and composting and manufacturing and buying of recycled content products (all processed and produced domestically) so we can support a new green economy. However, a goal of infinite consumption cannot be the path forward for planetary resilience. As a society, we have focused too much on recycling which has a feedback loop that creates a guilt-free consumption cycle allowing people to feel they can consume more and more as long as they think it can be recycled (which for some commodities isn't valid). While I support recycling and composting, community programs need to move up the waste hierarchy to waste prevention and reuse.

Last year the Center conducted a national survey along with focus groups about these issues. We asked survey respondents about their current behaviors and willingness to change behaviors. Eighty-one percent are willing to buy only what they need but within that group 31% need more information about how to do that. In the focus group, when discussing extended producer responsibility, planned obsolescence and the right to repair, there was a general lack of awareness for these topics. Once they were defined potential solutions revolved around transparency. For example, a consumer cannot easily purchase durable products when knowing what is or isn't durable is difficult to learn. Focus group participants were willing to work with corporations and organizations on these issues but there was a high amount of distrust along with lack of access to decision makers and a sense of helplessness by the individual. CT DEEP could help facilitate this by creating a clearinghouse of information about corporate planned obsolescence and product take back programs and providing education about this issue throughout the state.

Opportunities exist through increased efficiency, as well as design considerations that optimize material use, reuse, and recovery. The Sustainable Materials Management Initiative should include new cultural and business models that leverage approaches that shift from material consumption to service utilization with closed material loops. This market development should support a living-wage workforce and job training to help transition workers from waste management to prevention.

Examples include:

- **Reusables can save businesses money, and help restaurants, venues and food-service operations cut costs.** When businesses switch from single-use to reuse on site, they save money. When customers bring-your-own (BYO), or when restaurants/venues/cafes bring in reusable services for takeout/delivery, businesses can also save money. It's good for people, profit and the planet. I recommend CT DEEP look to the State of Oregon for potential waste reduction and reuse ideas. Oregon is a leader in bringing back [refillable beer bottles](#). Refillables are sorted, washed, inspected, and delivered back to Oregon's craft beverage producers.
- **Zero waste systems built around reuse, recycling and composting create local jobs and resilient, equitable communities.** Plastic container manufacturing can be outsourced, but reuse systems built on local companies running logistics for collection, sanitizing/washing, drop-off and inventory management support the local economy and community. According to [GreenBiz](#) customers are looking for supply-chain resilience and renewed value propositions. They want to know what to do with their product when it breaks. Supporting Right to Repair policies along with increased durability is important.
- **Reuse can support local and regional supply chains.** Local reuse systems aren't at the mercy of global supply chains for single-use products that could fall apart in times of crisis and they create good jobs in our communities. CT DEEP should work with local chambers and business development offices to make sure the state has robust thrift, rental and bulk store opportunities. Bring-your-own is a good first step but people also need third party, sanitized reusable cup, container, and packaging systems run by businesses so that customers don't have to remember to bring their own.
- **Performance tracking for waste prevention and reuse.** It is important that baseline threshold metrics be established and publicly available for waste reduction and reuse, along with incremental improvement goals to stimulate continued success and track progress. I recommend creating a performance goal regarding waste reduction such as pounds disposed per person per day. Using data collected by the EPA and shown [here](#) one can see that waste generation per person has nearly doubled since 1960. We need to have a national goal focused on decreasing waste generation. CT DEEP should also create an accompanying goal related to reuse. Potential performance metrics could include a reuse rate and reuse jobs number like a recycling rate and recycling jobs number. You could also note the number of state public health regulations allowing customers to "bring-your-own (BYO)" foodservice ware to an establishment for reuse.

MOVING FURTHER UPSTREAM

Decreasing the manufacturing and use of products made with virgin materials has numerous environmental benefits. It reduces the need for additional landfill disposal or incineration capacity and reduces air and water pollution during both disposal and production. Because recycled content products require fewer materials, prioritizing their use conserves land, reduces impacts on forests and other ecosystems, saves water and energy and decreases greenhouse gas emissions that contribute to global climate change.

According to a 2018 National Geographic report, of the 8.3 billion metric tons of plastic that have been produced, 6.3 billion metric tons have become plastic waste. Of that, only 9% has been recycled. The vast majority—79%—is accumulating in landfills or sloughing off in the natural environment as litter. This enormous amount of waste pollutes the environment often in communities of color, accumulates in oceans and in the tissue of fish and other wild animals, and creates deadly choking and entanglement hazards for wildlife.

The fossil fuel industry is aggressively expanding plastic production with no plan for preventing more plastic from ending up in our oceans. That increased plastic production is being driven by an oversupply of cheap, fracked natural gas in the United States. The biggest thing we can do to reduce ocean plastic pollution and support the frontline communities bearing the health and environmental impacts of fossil fuel development and plastic production is to produce less plastic. That starts with opposing the epidemic of new plastic plants and the cheap, fracked natural gas that fuels them.

CT DEEP should review the ideas noted in the [Break Free from Plastic Pollution Prevention Act](#) and incorporate items not already part of the Sustainable Materials Management Initiative.

#### BUILDING BACK EQUITABLY

The toll of COVID-19 has been tragic and the uncertain future of what it means for people long-term is frightening. Although economic shutdowns have resulted in some short-term reductions in consumption and waste, a pandemic is not the way to solve environmental problems. But what we can take away from the pandemic response is that policymakers and individuals are capable of swift, dramatic changes and that those changes can help the environment.

Conscious consumption means some people may need to consume less, some differently and others may need to consume more. COVID-19 has changed the way people consume things. In some cases, single-use disposables have increased due to the misconception they are more sanitary, but people are also cooking from home more and purchasing less of what they don't really need. One goal of the Sustainable Materials Management Initiative should be to reinforce and lock in these new sustainable lifestyle practices. We have an opportunity to jumpstart systemic alterations to how we produce and consume goods that will last beyond this crisis and formulate new narratives around what prosperity and well-being mean, more appreciation of the outdoors and more empathy toward others in their community.

Planning projects such as this should be led by the people who are most impacted and focus on reducing waste, creating safe green jobs, and enacting policies that encourage industries to redesign waste out of their business models. CT DEEP should bring together leaders from different sectors (business, NGOs, creatives, government, etc.) to identify obstacles to overcoming disposability and support equitable, inclusive conversations with communities, companies and organizations to dream up and implement ideas to co-create the beautiful, thriving world everyone wants to live in now and after the pandemic.

Thank you for the opportunity to comment on the Sustainable Materials Management Initiative. I am available to talk further about this if requested.

Respectfully submitted,  
/s/ Kelley Dennings  
Kelley Dennings  
Center for Biological Diversity  
PO Box 710  
Tucson, AZ 85702  
kdennings@biologicaldiversity.org

Kelley Dennings, PMP, MPH, CPH and Certified Family Planning Health Worker (FPHW)  
Center for Biological Diversity  
Population and Sustainability Campaigner  
she/her/hers

[kdennings@biologicaldiversity.org](mailto:kdennings@biologicaldiversity.org)  
919-355-8102

Comment:

The Center for Biological Diversity submits the following comments to the Connecticut Department of Energy and Environmental Protection regarding the Sustainable Materials Management initiative.

I have 15 years of experience working on recycling at the local, state and national levels as a community recycling coordinator, state recycling staff member and as a subject matter expert for two national non-profits. I currently work at the Center for Biological Diversity (the Center) - a national, nonprofit conservation organization with more than 1.7 million members and online activists dedicated to the protection of endangered species and wild places. We believe the health and well-being of humans is intrinsically linked to the health and well-being of nature. Thoughtful government programs can have an enormous impact on water, soil, climate, biodiversity, and the health of ecosystems.

First, I applaud the topics to which you are soliciting comments – unit-based pricing, organics, extended producer responsibility and recycling – however, this is no mention of reuse or waste prevention outside of food.

BEYOND RECYCLING

We need to continue to invest in recycling and composting and manufacturing and buying of recycled content products (all processed and produced domestically) so we can support a new green economy. However, a goal of infinite consumption cannot be the path forward for planetary resilience. As a society, we have focused too much on recycling which has a feedback loop that creates a guilt-free consumption cycle allowing people to feel they can consume more and more as long as they think it can be recycled (which for some commodities isn't valid). While I support recycling and composting, community programs need to move up the waste hierarchy to waste prevention and reuse.

Last year the Center conducted a national survey along with focus groups about these issues. We asked survey respondents about their current behaviors and willingness to change behaviors. Eighty-one percent are willing to buy only what they need but within that group 31% need more information about how to do that. In the focus group, when discussing extended producer responsibility, planned obsolescence and the right to repair, there was a general lack of awareness for these topics. Once they were defined potential solutions revolved around transparency. For example, a consumer cannot easily purchase durable products when knowing what is or isn't durable is difficult to learn. Focus group participants were willing to work with corporations and organizations on these issues but there was a high amount of distrust along with lack of access to decision makers and a sense of helplessness by the individual. CT DEEP could help facilitate this by creating a clearinghouse of information about corporate planned obsolescence and product take back programs and providing education about this issue throughout the state.

Opportunities exist through increased efficiency, as well as design considerations that optimize material use, reuse, and recovery. The Sustainable Materials Management Initiative should include new cultural and business models that leverage approaches that shift from material consumption to service utilization with closed material loops. This market development should support a living-wage workforce and job training to help transition workers from waste management to prevention.

Examples include:

- **Reusables can save businesses money, and help restaurants, venues and food-service operations cut costs.** When businesses switch from single-use to reuse on site, they save money. When customers bring-your-own (BYO), or when restaurants/venues/cafes bring in reusable services for takeout/delivery, businesses can also save money. It's good for people, profit and the planet. I recommend CT DEEP look to the State of Oregon for potential waste reduction and reuse ideas. Oregon is a leader in bringing back [refillable beer bottles](#). Refillables are sorted, washed, inspected, and delivered back to Oregon's craft beverage producers.
- **Zero waste systems built around reuse, recycling and composting create local jobs and resilient, equitable communities.** Plastic container manufacturing can be outsourced, but reuse systems built on local companies running logistics for collection, sanitizing/washing, drop-off and inventory management support the local economy and community. According to [GreenBiz](#) customers are looking for supply-chain resilience and renewed value propositions. They want to know what to do with their product when it breaks. Supporting Right to Repair policies along with increased durability is important.
- **Reuse can support local and regional supply chains.** Local reuse systems aren't at the mercy of global supply chains for single-use products that could fall apart in times of crisis and they create good jobs in our communities. CT DEEP should work with local chambers and business development offices to make sure the state has robust thrift, rental and bulk store opportunities. Bring-your-own is a good first step but people also need third party, sanitized reusable cup, container, and packaging systems run by businesses so that customers don't have to remember to bring their own.
- **Performance tracking for waste prevention and reuse.** It is important that baseline threshold metrics be established and publicly available for waste reduction and reuse, along with incremental improvement goals to stimulate continued success and track progress. I recommend creating a performance goal regarding waste reduction such as pounds disposed per person per day. Using data collected by the EPA and shown [here](#) one can see that waste generation per person has nearly doubled since 1960. We need to have a national goal focused on decreasing waste generation. CT DEEP should also create an accompanying goal related to reuse. Potential performance metrics could include a reuse rate and reuse jobs number like a recycling rate and recycling jobs number. You could also note the number of state public health regulations allowing customers to "bring-your-own (BYO)" foodservice ware to an establishment for reuse.

#### MOVING FURTHER UPSTREAM

Decreasing the manufacturing and use of products made with virgin materials has numerous environmental benefits. It reduces the need for additional landfill disposal or incineration capacity and reduces air and water pollution during both disposal and production. Because recycled content products require fewer materials, prioritizing their use conserves land, reduces impacts on forests and other ecosystems, saves water and energy and decreases greenhouse gas emissions that contribute to global climate change.

According to a 2018 National Geographic report, of the 8.3 billion metric tons of plastic that have been produced, 6.3 billion metric tons have become plastic waste. Of that, only 9% has been recycled. The vast majority—79%—is accumulating in landfills or sloughing off in the natural environment as litter. This enormous amount of waste pollutes the environment often in communities of color, accumulates in oceans and in the tissue of fish and other wild animals, and creates deadly choking and entanglement hazards for wildlife.

The fossil fuel industry is aggressively expanding plastic production with no plan for preventing more plastic from ending up in our oceans. That increased plastic production is being driven by an oversupply of cheap, fracked natural gas in the United States. The biggest thing we can do to reduce ocean plastic pollution and support the frontline communities bearing the health and environmental impacts of fossil fuel development and plastic production is to produce less plastic. That starts with opposing the epidemic of new plastic plants and the cheap, fracked natural gas that fuels them.

CT DEEP should review the ideas noted in the [Break Free from Plastic Pollution Prevention Act](#) and incorporate items not already part of the Sustainable Materials Management Initiative.

### BUILDING BACK EQUITABLY

The toll of COVID-19 has been tragic and the uncertain future of what it means for people long-term is frightening. Although economic shutdowns have resulted in some short-term reductions in consumption and waste, a pandemic is not the way to solve environmental problems. But what we can take away from the pandemic response is that policymakers and individuals are capable of swift, dramatic changes and that those changes can help the environment.

Conscious consumption means some people may need to consume less, some differently and others may need to consume more. COVID-19 has changed the way people consume things. In some cases, single-use disposables have increased due to the misconception they are more sanitary, but people are also cooking from home more and purchasing less of what they don't really need. One goal of the Sustainable Materials Management Initiative should be to reinforce and lock in these new sustainable lifestyle practices. We have an opportunity to jumpstart systemic alterations to how we produce and consume goods that will last beyond this crisis and formulate new narratives around what prosperity and well-being mean, more appreciation of the outdoors and more empathy toward others in their community.

Planning projects such as this should be led by the people who are most impacted and focus on reducing waste, creating safe green jobs, and enacting policies that encourage industries to redesign waste out of their business models. CT DEEP should bring together leaders from different sectors (business, NGOs, creatives, government, etc.) to identify obstacles to overcoming disposability and support equitable, inclusive conversations with communities, companies and organizations to dream up and implement ideas to co-create the beautiful, thriving world everyone wants to live in now and after the pandemic.

Thank you for the opportunity to comment on the Sustainable Materials Management Initiative. I am available to talk further about this if requested.

Respectfully submitted,  
/s/ Kelley Dennings  
Kelley Dennings  
Center for Biological Diversity  
PO Box 710  
Tucson, AZ 85702  
kdennings@biologicaldiversity.org