

Thank you for the opportunity to comment and submit some of my perspectives related to the management of our waste streams. For several years, I have advocated for a more holistic approach that emphasized education, incentives, and enforcement.

I am a major supporter of your CCSMM Initiatives and participated in as many sessions as possible during the Pandemic and beyond.

I am a waste management professional and a member of several environmental advocacy groups, including but not limited to the Norwalk Zero Waste Coalition, the Sustainable Fairfield County Food Scrap Working Group, and the CT Zero Waste Coalition.

While I do not agree with every point made by these advocacy groups, I fully support their main intent: to achieve a well-managed waste reduction program that is equitable to all that includes a robust waste reduction effort, and saves money.

I have attached the recent February 2023 testimony by my colleague Diane Keefe, the Chair of the Sustainable Fairfield County Food Scrap Working Group that I am a member of. I have highlighted in bright blue the infrastructure suggestions that our group voted to offer to the Governor's Waste Management Bill, 6664. These highlighted suggestions also serve as my suggestions for this RFI.

In addition, I offer the following ideas:

1. As we know, CT will not be able to achieve the goals set by the 2016 Comprehensive Materials Management Strategy. In order to expedite achieving future goals, the CTDEEP immediately needs to consider supporting waste management and reduction programs through Regional Waste Authorities (RWAs) or the COGS if an RWA is not organized this year. There is no more time for delay.
2. If some municipalities balk at the thought of a cooperative, regional waste management strategy, they should have select state grant monies withheld until they do. Voluntary waste management improvements are taking too long, as the missed 2016 CMMS and Governor Malloy's Special Recycling Task Force goals revealed.
3. Regional Approach set up this year without delay: CT needs to incentivize inter-town cooperation in order to speed up the solutions to the crisis we find ourselves in. A mandate may be necessary.
4. CTDEEP assignment of Waste Management Specialists in each Regional Waste Authority or the COG in order to provide technical assistance, support, and education to the local officials, residents, and businesses within each region.
5. Every Town has been mandated to identify its town Recycling Coordinator, yet the amount of time and the ability of the assigned staff varies widely. While towns like Middletown have demonstrated leadership and innovation, there are many towns that have not, further causing further crisis and expense.

6. CT must stop utilizing Pilot Programs in a piecemeal manner when we know certain measures work. For example, food donation and diversion programs that other states such as NY have mandated.
7. Let's also have an honest discussion about Unit-based pricing and mandate its implementation across the board. We still have not educated officials and legislators about the many benefits of UBP, or PAYT. Let's invite Worcester, Mass. to speak in front of the legislature sooner rather than later. Money savings are a great motivator!
8. Ensure that all school districts are recycling and diverting food scrap.
9. Municipal Enforcement: Whatever system that the state of Connecticut puts in place, we will again fail if the regulated community, including towns, cities, and school districts, does not feel their *inaction* will have any consequence. One way to give all sectors a heads-up is to make an example of the most egregious of the violators, including press coverage. The CTDEEP should hire more enforcement staff that also are trained to educate the regulated community.
10. Food Scrap Management: Remove ALL waivers, geographic distances, and barriers to developing small, medium, and large food composting facilities.

Sincerely

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