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John Fischer  
Massachusetts Department of Environmental Protection  
1 Winter Street  
Boston, MA 02108

Dear Mr. Fischer,

Thank you for the opportunity to submit comments on DEP's draft 2030 Solid Waste Master Plan (SWMP). As we come to the end of the period covered by the 2010-2020 SWMP, it is evident that we have not taken effective steps to address Massachusetts' waste issue. In the face of unprecedented challenges in waste management and recycling, we need a rigorous, specific, and innovative master plan for everyone in the state to get behind. While the draft plan proposes some excellent strategies and initiatives, I would like to provide some additional recommendations.

### **GDP and Population Growth Forecasting**

Whereas the previous plan set a goal of reducing annual statewide waste disposal by 30 percent to 4.55 million tons by 2020, in 2018 we disposed of 5.7 million tons. This level is essentially unchanged since 2011. Although the draft 2030 SWMP notes that the state's GDP has grown 16 percent during that period, and the population by 5 percent, that does not diminish the unfortunate fact that we did not reach a necessary target. The next plan needs to emphasize that we can grow GDP and still reduce waste.

In its upcoming SWMP, DEP should account for projected GDP and population growth when setting waste reduction goals and should set per capita reduction goals. This will help to put goals for tonnage and percentage reductions in proper perspective and make clear our commitment to making significant progress on waste management even as our economy continues to grow.

### **Reduction Goals**

Given the radically altered and increasingly volatile recycling export market, paired with disappearing in-state disposal capacity, the 2030 SWMP must present bolder goals than ever before. Instead of using our current disposal level as the baseline, the missed 2020 goal of 4.55

tons should be the starting point for an additional 30 percent reduction by 2030, aiming to close the gap created during the last decade. This is not unrealistic – over 70% of what is currently burned or buried should not be, either because it is illegal under 310 CMR 19.000 or because it can be recycled.

An adjustment to the 2030 goal would also help create a better balance with the disproportionately large tonnage reduction needed between 2030 and 2050 to reach DEP's stated goal of 90 percent reduction by 2050. The plan must highlight the urgency of bold action now, instead of assuming a more rapid rate of reduction will be possible later in this century, when challenges are even less foreseeable.

In the interim, staying on top of yearly benchmark goals will get us closer to reaching the 2030 target. Frequent reminders of benchmarks will boost a sense of urgency. The ability to measure and publicize progress and adjust tactics on a yearly basis is invaluable.

### **Capacity Management and Facility Oversight**

Even if the draft plan's waste reduction goal is met, we will still face a net shortfall in disposal capacity of 700,000 tons per year in 2030. The plan should aim to bridge that shortfall while setting goals that eliminate the 3.5 million tons of combustion capacity and the 350,000 tons of capacity reserved for false solutions such as gasification and pyrolysis. Studies have shown that these alternative waste-to-energy facilities use as much as 87 times more energy than they produce, and struggle to be financially viable.

Any type of waste burning endangers our health, our climate, and our environment, offsetting potential capacity-increase benefits. If a plan for eliminating currently-permitted municipal waste combustion facilities cannot be established, at the very least they must be required to meet the most up to date emissions and efficiency standards.

In addition, as food waste diversion is expanded, DEP oversight should ensure that food waste will not be mixed with combined sewage sludge in wastewater treatment plants.

### **Reduction Strategies**

Encouraging and even mandating greater source reduction and demand management must be the central emphasis of the plan. Specific timelines and benchmarks should be outlined in the plan to target priority, high-impact areas, such as recycling market development, additional waste bans, extended producer responsibility, and reduction of single-use packaging.

A plan to bring industry to the table should be presented so we can move toward a more circular economy. Materials and products need to become compatible with the goals and functioning of our waste systems and reduction efforts. In short, we need an overhaul in the way products are designed, manufactured, and repurposed. Consumers are demanding new options for products and packaging, and the next ten years are the time to establish new ways of meeting that demand. DEP should conduct pilots to demonstrate that this shift is economically feasible.

## **Enforcement and Accountability**

A target number of enforcement actions per year should be set, and education and awareness should be a priority outcome of enforcement. The enforcement of waste bans should be prioritized to reduce the toxicity of waste that cannot be diverted. Data on enforcement should be more publicly accessible. It is difficult at present to access information on enforcement levels over time. The EEA Data Portal should be equipped with the ability to filter information by program type to show waste enforcement levels and compare changes over time.

Hard constraints on waste disposal capacity will mean higher costs for municipal solid waste programs and the residents who pay for them, while also burdening businesses and institutions that contract on their own for waste disposal. The plan should include a fiscal analysis and projections for the costs of recycling and disposal, so that municipalities and other entities can plan ahead to make necessary shifts.

## **Equity and Environmental Concerns**

All of us – particularly those living in communities that host disposal facilities – will continue to suffer significant negative impacts from waste disposal on the climate, environment, and public health. We need to be intentional about breaking the cycle of siting facilities in predominantly low-income areas and in communities of color. These communities bear an undue burden from pollution of all kinds.

Nationally, the greenhouse gas emissions that are generated over the full lifecycle of disposed materials (including emissions from overall production, use, transportation and disposal of products and packaging) are estimated to account for 42 percent of total greenhouse gas emissions. As stated earlier, we must adopt a broad array of approaches that will discourage unnecessary consumption and waste generation in the first place.

## **Public Involvement & Coordination with Policymakers**

Every day, more people in Massachusetts seek to shift their individual behavior in order to reduce their contribution to the state's unsustainable waste levels. People are reducing the amount and type of trash they generate by composting, shopping locally, bringing their own reusable bags to the store, or eliminating single-use plastics from their lives. This master plan must support residents by providing an ambitious and achievable framework to reduce waste. To be effective, it must also involve them in that process in a more comprehensive and sustained way.

The SWMP needs to encourage better coordination between state agencies, advocacy groups, legislators, industry, and the public to work toward goals as efficiently and effectively as possible. In doing so, we can encourage the transition to a sustainable solution to our state's waste problem. The state needs leadership and guidance from DEP to prioritize actions that will help remove roadblocks and move the state toward our Zero Waste goals.

The coming decade will be a turning point for waste management in our state. With everyone's involvement and effort, we can move toward a future that uses our resources conscientiously. Thank you very much for taking the time to consider these comments. I look

forward to seeing the final 2030 SWMP and urge DEP to include these revisions to help address the waste crisis.

Best regards,

A handwritten signature in blue ink, appearing to read 'J. Hecht', with a large, sweeping flourish above the first part of the name.

Jonathan Hecht  
State Representative  
29<sup>th</sup> Middlesex District