Testimony
for the
Environment Committee
of the
Connecticut Legislature
on
Senate Bill 234

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Submitted by

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INTRODUCTION

The CT Chapter of the National Waste and Recycling Association (hereafter the chapter) represents an industry that is dedicated to the environmentally protective, sustainable and economically efficient management of recoverable and recyclable materials, discards and wastes.

We have a vision of a society that reduces waste, recycles more and recovers value from discards to the maximum extent practicable and that properly disposes the wastes that remain. We approach our job as reality-checkers who must negotiate, adapt to, and address the day-to-day and evolving conditions associated with collecting and handling recyclables, recoverable materials, discards and wastes. We are in a unique position to offer well informed perspectives on the realities of how these materials are managed today, and how they can be better managed tomorrow.

We are grateful for this opportunity to provide these comments to the CT Environment Committee on legislation about food waste collection and the management of this waste stream at anaerobic digesters.

S.B. No. 234 -- An Act Concerning a Pilot Program for Curbside Food Waste Collection Used in Anaerobic Digesters (AD)

The chapter supports this legislation. This kind of alternate management of these wastes, from current collection and management processes, holds great promise. The long term hope is, in time, the alternative management of the organic portion of our waste stream will grow to be significant; perhaps at the rate and akin to the role that curbside recycling plays today.

We want to remind the committee that the build out of the state's modern recycling system infrastructure took the better part of 35 years to achieve. Along the way to our success in recycling today, we hit lots of speed bumps and had significant setbacks and had to overcome many challenges. With this long view in mind, we want to offer several thoughts about the alternative management of food wastes and organic matter.

First the committee should know the USEPA is pushing a national campaign these day "not to make food waste in the first place" in all food operations – including agriculture practices; food processing and distribution; and even in our homes. As these efforts succeed, the amount and kinds of food waste for use in diversion management programs -- like AD facilities or composting operations -- will change overtime and decrease.

The programs underpinning the "make less food waste" national USEPA initiative include efforts to raise general awareness about our food waste problem and also to introduce principles of LEAN manufacturing to agricultural operations and to all segments of our food supply chain operations. The national dialog here is nascent; but there are positive results already bubbling up. Another key part of this program's hierarchy is to work to capture the maximum amount of food from becoming waste for management in our after useful life waste systems by focusing anew on efforts to feed people or animals first with them. Again, these efforts are just getting traction and show encouraging promise to reduce the amounts of food needing to be managed in waste management systems.

Members of the committee may be aware of some of the hic-cups the recycling industry faces today. One them involves "wish-cycling" or "aspirational" contamination in recycling barrels. This problem is so significant amongst the waste generating public that the CT DEEP established an excellent "what's in – what's out" of the recycling barrel campaign with attendant website links in 2018 (see http://www.recyclect.com/). The industry provided input for this DEEP initiative and is very supportive of DEEP work in this area. We bring this up in this context since, as reality checkers, we believe the committee needs to know large scale food waste organics generators in CT today have shown reluctance to participate in source separated food waste organics programs we currently offer. When they have though they have often failed to keep their food wastes free of contaminates that foul AD and composting programs.

Connecticut's solid waste system is one of the best in the nation. The state's system makes it largely self-sufficient in its solid waste management needs as it makes extensive use of in-state Waste-to-Energy plants for its mass disposal needs; and has excellent and universal recycling achieving 35% waste diversion rates; and has vibrant volume reduction systems for the management of special, bulky and construction and demolition wastes. The addition of AD and compositing facilities to its solid waste system asset mix is planned and needed for capacity reasons, as projected in the state's current waste plan.

One of the arguments for AD is that it is not traditional disposal and that its use is better than waste-to-energy disposal or landfilling. We encourage the committee to explore hard, environmental impact life cycle analyses (LCA) of these claims. We know about and support the attributes of food waste reduction first and about then working new efforts to divert food wastes to AD and composting programs. That said, we also know that making these changes come with a new set of unique problems and issues. Issues that are important for all of us involved in managing these wastes to know about and to fully understand. One of the big impacts of trying to implement broad scale food waste collection programs, in addition to generator contamination noted above, involves the realities of small generated volume routing efficiencies and the environmental impacts from attendant trucking collection operations. We believe our overall understanding of these issues will improve greatly -- if the pilot program to be authorized by this legislation -- is also required to conduct-- in concert with it -- a full LCA environmental impacts analysis.

The implementation of any curbside food waste collection program also triggers many new costs and other impacts. Some of these costs will be for things like the new specialty carts required for food waste collection; new costs for special collection trucks and new collection routes; new transportation costs – both in actual expense and carbon footprint impact (especially if AD or compost sites are more distant that current disposal sites); and the expense and effort of educating and winning the hearts and minds of generators so they accept and change their current set out habits, based on the convenience of their current collection programs for their wastes and recyclables ,

Thank-you for your attention to our comments and views. We stand ready to work with the sponsors, committee, DEEP officials and others, and with our customers to create the best recycling and waste management programs for CT as possible.

NWRA's CT chapter represents the private sector waste and recycling industry statewide. According to data compiled by NWRA, in CT, the private waste and recycling industry employs nearly 5,500 people. The annual economic impact to the CT state economy, generated by the waste and recycling industry, is $1.9 billion. When the activity of the waste and recycling industry with other industries is calculated, the waste and recycling industry's overall impact to CTs economy is $ 3.7 billion annually.