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Mr. John Fischer
MA Department of Environmental Protection
1 Winter St.
Boston, MA 02108

RE: Public Comment on the 2030 Massachusetts Solid Waste Master Plan

Mr. Fischer,

MassRecycle is the only statewide 501c (3) coalition of individuals, all 351 municipalities, recycling and green businesses, and other organizations dedicated to increasing recycling and waste reduction in the Commonwealth. As part of its effort to create effective materials management systems, MassRecycle reformed the Massachusetts Product Stewardship Council (MassPSC). The MassPSC is now part of MassRecycle and their goal is to promote and advocate for extended producer responsibility initiatives to help municipalities cope with the mounting costs they are facing managing materials from residents.

MassRecycle appreciates the long-term planning efforts by MassDEP included in the 2030 Solid Waste Master Plan. MassRecycle supports many of the strategies included in the SWMP to reach the goal of 30% reduction in waste disposal by 2030. In particular:

- MassRecycle strongly supports the threshold reduction of the commercial organics ban to ½ ton of food waste generated per week. Regarding the timeline for implementation, the economic impacts from the COVID-19 pandemic on our business community, especially restaurants and the tourism industry (hotels, etc.), should be considered. The timeline for implementation of this threshold reduction should be adjusted with this consideration.
- MassRecycle strongly supports the textiles disposal ban. The timeframe for implementation of this ban must also be adjusted to accommodate for textile donation outlets to adapt their operations to ensure safety of all workers and end users from COVID-19, while also being able to accept pre-COVID-19 levels of donated materials.



- MassRecycle, and its subsidiary the Massachusetts Product Stewardship Council, strongly support the advancement of extended producer responsibility (EPR) systems for priority materials including paint, mattresses, and electronics. It is imperative for MassDEP to educate the Legislature and other stakeholders, especially potential takeback sites, in order for support for these EPR programs to take hold. This is common practice for equivalent agencies in neighboring states such as Vermont, Maine, and New York.

Where the 2030 SWMP could be improved:

- A ban on recyclable mattresses should not be implemented until an EPR system or a different funding mechanism is determined and flexibility in managing unrecyclable mattresses is considered. Especially, due to COVID-19 response costs and loss of revenue, municipalities cannot be expected to shoulder the cost to recycle mattresses. Furthermore, we do not support a “zero tolerance” threshold for a mattress ban if implemented. Not all mattresses are in suitable condition for recycling, yet they must be safely disposed. Also, municipalities have limited storage capability which can quickly fill up if a vendor cannot service them regularly which can create a safety concern. Therefore, we are eager for the passage of S2388 which would create a study commission that would evaluate the best way to create a mattress collection and recycling system in MA.

Respectfully,

Gretchen Carey

President, MassRecycle

Phil Goddard

Chair, MassPSC

CC: Mr. Daniel Sieger, MA EEA
Undersecretary for Environmental Affairs