



June 22, 2023

Hawaii Environmental Management Commission
Attention: Peter Sur

Re: Agenda Item V2.2 for the June 23, 2023 meeting

Dear Commissioners:

I am writing to you on behalf of The Story of Stuff Project, an international organization with one million members that inspires civic engagement in addressing the problem of too much Stuff in our consumption-crazed culture. This letter is our written testimony regarding the proposed ordinance to prohibit the landfilling of recyclable items.

We support the concept generally but oppose the proposal to encourage incineration as an acceptable alternative to landfilling, as this is neither consistent with zero waste principles and it would result in human health and greenhouse gas impacts that are unacceptable. The proposal by Yummet to build a facility that employs technology that would turn waste into biochar and concrete is associated with negative environmental impacts. Recent peer-reviewed analysis of the negative impacts cites the following concerns:

- As a soil amendment, biochar may negatively affect the growing conditions of microorganisms in the soil and crops- it is associated with toxic effects on plants and inhibition of plant growth; and
- Biochar poses risks to aquatic environments, including accelerated eutrophication (oxygen starved waterways that result in algal blooms) and pollution.¹

For an additional review of the health and environmental impacts of waste incineration, we refer you to the Global Alliance Against Incineration and their fact sheet on this topic.²

[Hawai'i County's Life Cycle Analysis for recycling](#) completed by the county concluded that overall, **“landfilling produces less carbon emissions and incurs less environmental damage costs per ton of materials as compared to incineration.” Recycling was the best option**, even when factoring in shipping of materials to distant markets. Rather than pursue expensive, potentially hazardous, and unproven technological fixes to the waste problem, we urge the Commission to prioritize programs that eliminate waste by turning from single-use to reusable products and packaging, and to focus on mechanical, closed loop recycling that actually cut the use of virgin materials, and composting for organics like food and plant waste.

Sincerely,
Miriam F. Gordon
Miriam F. Gordon
Reuse Activator

¹ Xiang, L., et al (2021), The Potential hazards of biochar: The negative environmental impacts of biochar applications, Journal of Hazardous Materials, 420/126611.

² https://www.no-burn.org/wp-content/uploads/Pollution-Health_final-Nov-14-2019.pdf