



Date: June 21, 2023

Re: Agenda Item V.2.

Members of the Environmental Management Commission,

Agenda Item V.2. Continued discussion of EMC county landfill diversion ordinance initiative.

We appreciate the Environmental Management Commission taking the lead to draft an ordinance that will reduce the burden on our island's only operating landfill by banning certain recyclable items such as green waste, metals, plastics, paper, paperboard, and glass from landfilling. ZWHI is **supportive of this ordinance** as it will make available the volume of recyclables necessary (particularly from the commercial sector) to develop systems to recycle and reuse much of our resources on island through the development of Resource Recovery Parks.

We would like to highlight a few components of this draft ordinance that we support:

- Reporting requirements for government and large businesses on waste diversion
- The inclusion of performance targets (however as currently drafted it is not clear if the targets apply to the overall waste stream or to only recyclable items that would be banned). Tracking by both weight and volume is suggested as volume would show a reduction in waste such as plastic that is light but takes up a lot of space vs organic food waste which takes up little space but weighs more.
- Allowing small businesses to utilize the transfer stations to recycle.
- Allocation of funding to hire staff, implement the ordinance and creation of a grant program for organizations developing landfill diversion programs.

There other components of this draft ordinance that raise concerns and/or could use additional thought:

- The ordinance should perhaps be more prescriptive and leave less up to DEM to determine by rule. Currently DEM is to determine by rule which items would be banned from landfilling and which "persons" (for example large businesses, multifamily subdivisions, county facilities, schools, nonprofits, small businesses, and residents) would be required to comply with diverting recyclable items from landfilling. Given DEM's capacity and staffing shortages, having a bill with more of the details worked out may be preferable to the department and result in better implementation.
- Perhaps the part of the definition of "designated recyclable materials" as "at a price that is less than the cost of solid waste disposal" should be omitted. Even if it

costs a bit more, there are other environmental and economic benefits to recycling as it will extend the life of the landfill.

- Inclusion of a priority list for reduction in volume **should not include incineration** as an acceptable alternative to landfilling. Incineration is not part of a zero waste philosophy and a recent result for [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."** Following the zero waste hierarchy, incineration is at the bottom, below landfilling, and it is never considered an acceptable means of managing waste.

In summary, this draft ordinance is a great start, and we are looking forward to seeing how this legislation evolves, hopefully with language around incineration removed as it is not a part of zero waste philosophy.

Thank you for this opportunity to submit testimony.

Mahalo nui loa,



Jennifer Navarra
Program Director
Zero Waste Hawai'i Island

Zero Waste Hawai'i Island's mission is to connect diverse Hawai'i Island Communities to support equitable systems redesign and policy change to achieve zero waste.