



GiNRE - Waste Statement

Statement Against Waste as a Source of Renewable Energy

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Group name would like to express its grave concerns about the proposed policy to classify landfill gas to energy (LFGE) and waste incineration projects as renewable energy technologies.

Garbage is neither renewable nor sustainable. It results from mismanaging natural, often finite resources. Tax credits, subsidies and other policies promoting or accepting waste as a renewable energy source not only compete against wind and solar projects, but they also undermine the economic incentives for recycling, composting, and truly sustainable resource management.

Vigorous expansion of truly renewable energy technologies, such as wind and solar, is vital to our transition to a sustainable environment and society. However, policies that include waste as a source of renewable energy continue to promote excessive resource destruction and inefficient resource use. These policies also drastically understate the threat of current landfilling and incineration practices to human and environmental health. Our concerns with the proposed policy are as follows:

Methane emissions are drastically understated.

Methane is a greenhouse gas 23 times more potent than carbon dioxide. It occurs when organic materials are disposed of in a landfill. The U.S. EPA assumes collection efficiency of methane at landfills is 75%, but measurements have been reported as low as 9 percent. The 2006 Intergovernmental Panel on Climate Change (IPCC) estimates recovery efficiency at an average of 20 percent. This range of efficiency estimates indicates the many uncertainties involved in this issue, and even the waste industry attests methane emissions are not accurately tabulated. This means landfills may be a greater contributor to climate change than originally thought, putting more emphasis on the need to end the landfilling of organic materials.

Composting organics restores our soils and helps slow climate change.

Discarded organic materials such as yard trimmings, food scraps, soiled paper and other paper products are the primary cause of methane emissions from landfills, but more importantly, they are valuable soil amendments. Composting these materials not only reduces greenhouse gas emissions by avoiding landfill methane emissions, but it also decreases fertilizer and pesticide use, improves soil structure, reduces irrigation needs, decreases the effects of high salinity, increases productivity, limits erosion, and helps store carbon in our soils. Renewable energy credits for landfills create an incentive to continue the burying of these valuable organic resources and directly oppose the goals of long-term soil health and sustainable agriculture.

Composting organics eliminates methane and protects public health.

A community committed to source separating organics for composting will greatly reduce or eliminate its landfill's

generation of methane, reduce its greenhouse gas emissions and protect its citizens' health. However, a community invested in gas recovery from its landfill retains a financial interest in landfilling biodegradable materials and will need to protect this investment and preserve the status quo, never nearing a more sustainable environmental solution.

Organic materials in the landfill also lead to the production of leachate. The liquids produced from the biodegradation of these organic materials seep through the landfill and collect toxic chemicals and heavy metals from the contents of the landfill. This leachate will migrate to the bottom of the landfill and eventually leak through the liner, potentially contaminating local groundwater. By removing the organics from the landfill, a community can minimize the production of leachate, protecting its groundwater and potentially savings itself tens of millions of dollars in groundwater remediation and hazardous waste cleanup.

From Seattle to Nova Scotia in North America and throughout the European Union, communities and countries are recognizing the inevitable harm caused by landfilling. These countries and communities are reducing this harm by removing organic materials from the landfill and reducing waste. They have committed to sustainability and the protection of environmental and human health and are not adopting energy policies or creating incentives for the continued landfilling of organics. Because of the risk posed to public and environmental health, methane capture should be mandatory at all active landfills.

Incineration is a waste of energy and a dangerous source of pollution.

Burning our discards releases harmful pollutants into the air, recovers only a fraction of the energy used during the products' life cycle, and perpetuates the system of destroying natural resources to make new products. Incinerators produce dioxins, heavy metals such as mercury and lead, particulate matter, and hundreds of other toxic byproducts, only a handful of which have been identified or studied. When air pollution controls are installed to mitigate these emissions, hazardous substances are just transferred to the fly ash, leaving another hazardous waste problem.

Recycling is more effective at saving energy.

By recycling 30% of our discards in 2003, U.S. communities saved 1,486 trillion BTU--an amount equivalent to the consumption of 11.9 billion gallons of gasoline or 256 million barrels of crude oil. Recycling also provides greater net energy and greenhouse reductions than incineration across a wide range of consumer products. Furthermore, the combustion of HDPE, LDPE and PET plastics in waste incinerators is a net contributor to greenhouse gas emissions.

Group name strongly urges you to amend this policy to exclude waste as a source of renewable energy and to commit to truly renewable energy technologies and the highest and best use of resources.

Sincerely,

Group name

Sources

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