

Comments Submitted by William Shubert, Waste Management
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In the CIA Subgroup, we discussed the policy; "Increase Traditional Recycling Diversion Rate with Municipal Goals and by Stimulating Demand for Recycled Materials". In our discussion, we identified that diverting materials from landfills alone did not achieve the desired GHG reductions. In fact, recent attempts in our state to raise diversion rates often resulted in activities that were GHG neutral or positive. The reductions anticipated by this policy could be achieved by making sure that recycled materials were reused as secondary materials. It is important that the implementation of this policy focus on the correct measurable, namely commodity reuse, to ensure the desired outcome.

Therefore, I would suggest that we retitle the policy: " Increase in Secondary Material Usage with Municipal Recycling Goals and by Stimulating Demand for Recycled Materials". Such a title would help to encourage the correct measure of success when this policy is developed.

Thanks for your consideration. Feel free to contact me with any questions.