



Environmental and Energy Study Institute

October 7, 2022

Zero Waste DC

RE: Environmental and Energy Study Institute Period 1 Public Comments About the Zero Waste DC Plan Draft Framework

Thank you for the opportunity to provide comments on the Zero Waste DC Plan Draft Framework. The Environmental and Energy Study Institute (EESI) is a non-profit organization founded in 1984 on a bipartisan basis by members of Congress to help educate and inform policymakers, their staff, stakeholders, and the American public about the benefits of a low-emissions economy that prioritizes energy efficiency, renewable energy, and new clean energy technologies. In 1988, EESI declared that addressing climate change is a moral imperative, and that has since guided our work.

Our office is located in downtown Washington, D.C., and many of our staff have made the city their home. (Most everyone else lives nearby in suburban Maryland or Virginia.) While we do not consider ourselves experts in waste management, we do our best to minimize our own environmental impacts as good “corporate” citizens of D.C. Several elements of the draft framework would help us do better as an organization and a collection of concerned individuals who spend at least part of the day in Washington.

Please accept these comments in the spirit of lively participation in an important exchange of ideas that could help D.C. achieve its goal of 80 percent of solid waste diverted away from landfills and waste-to-energy by 2032. In order to meet that goal, everyone—EESI included—will have to do their part, which many elements of the framework could facilitate, incentivize, and operationalize so more sustainable waste management practices and behaviors become ingrained in how we all go about our business.

Please feel free to my colleague, Dan O’Brien (dobrien@eesi.org), or me with any questions or requests for additional information.

Thank you for your consideration.

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Section 1. Reduce Per Capita Waste Generation.

7. Deconstruction.

The Environmental and Energy Study Institute (EESI) would support the implementation of a mandatory deconstruction policy for commercial buildings. EESI completed an office move in January 2022 that we acknowledge contributed to wasted materials during the demolition, construction, remodeling of our new suite. Even though we only moved two floors in the same building and were advised by brokers and architects who shared our commitment to sustainability, there was a limit to how much we could salvage and reuse. Commercial office buildings are constantly remodeled and retrofitted to accommodate new tenants and uses of space, and undoubtedly these moves and renovations generate large amounts of waste with too few obvious or available options to encourage reuse of materials. We would have appreciated and benefited from a deconstruction policy and the associated opportunities to reuse materials. In addition, we hosted an online briefing for policymakers in December 2021 about the climate impacts of construction waste. The archived webcast, presentation materials, and written summary notes are available at www.eesi.org/120821waste.

Section 2. Transition From Single-Use Towards Re-Use

10. Refill and Reuse. The Environmental and Energy Study Institute would participate in a program to encourage restaurants and caterers to use (and accept the use of) refillable and reusable containers for takeout. We often provide food and refreshments (sourced from local restaurants) to guests at events we host, and options to reduce waste—beyond recycling—are rarely available. We would likely choose to order from restaurants and caterers that provided an option to refill and reuse containers.

11. Zero Waste Food Delivery.

The Environmental and Energy Study Institute would support zero waste requirements for food deliveries. We often provide food and refreshments to guests at events we host, and we would have more control over the waste produced if we could opt-out of single-use items like cutlery and condiments and instead provide more sustainable options. To the extent bags are necessary for takeout, we would encourage the use of paper products. Complementary Zero Waste DC plan initiatives to improve convenient access to composting and recycling would allow EESI to reduce our waste from events even more.

12. Reusable and Compostable Foodware.

The Environmental and Energy Study Institute provides staff and guests access to reusable utensils, plates, cups, and mugs in our office kitchen. To the extent that other foodware is necessary (for takeout, for example), EESI would support requirements to reuse, recycle, or compost materials—including items that we separately purchase for our own use.

13. Hydration Stations.

The Environmental and Energy Study Institute would support publicly-available hydration stations. Our staff rides Metro or bikes or walks to work, and we often take meetings in parks

and outdoor spaces. Convenient access to potable water to refill water bottles would be welcome, especially on hot and humid summer days. These hydration stations would be more broadly beneficial to the community by reducing litter from single-use bottles as well as residents who face higher health risks when coping with extreme heat, lack access to air conditioning, or work outdoors. In addition, we hosted an online briefing for policymakers in June 24, 2022 about the negative health effects of extreme heat on vulnerable populations. The archived webcast, presentation materials, and written summary notes are available at <https://www.eesi.org/062422climatechange>.

14. Single-Use Plastics Ban.

The Environmental and Energy Study Institute hosted an online briefing for policymakers in December 2021 that highlighted a report by Beyond Plastics, “The New Coal: Plastics and Climate Change.” According to our panelists, the U.S. plastics industry is responsible for at least 232 million tons of carbon-dioxide-equivalent emissions each year. The archived webcast, presentation materials, and written summary notes are available at www.eesi.org/120921waste.

Section 3. Increase Recycling & Composting Participation & Accessibility

16. Universal Recycling and Compost.

The Environmental and Energy Study Institute would support a requirement for recycling and composting in commercial buildings, and we would likely make use of this service to manage our waste. We currently compost food waste generated in our office, but the practice requires staff to transport scraps to their home. This could be a deterrent for other organizations that could be alleviated by better access to composting in commercial buildings where the waste is generated.

19. Recycling and Composting at Transit Sites.

The Environmental and Energy Study Institute would support adding recycling and composting containers at Metro and other transit stations. Our staff rides Metro, bikes or walks to work, which means that transit stations are important hubs as we move across the city each day. EESI encourages the Department of Public Works to improve convenient access to recycling and composting containers at locations like Metro stations that already and regularly attract commuters as well as tourists.

22. Food Donation Requirements.

The Environmental and Energy Study Institute hosted an online briefing for policymakers in December 2021 about policies and strategies to reduce food waste. According to a November 2021 report by the Environmental Protection Agency, the annual greenhouse gas emissions of food loss and waste is equal to 42 coal-fired power plants and the water and energy used on wasted food is enough to supply 50 million homes. The archived webcast, presentation materials, and written summary notes are available at www.eesi.org/121021waste.

24. Mobile Resource Recovery.

The Environmental and Energy Study Institute would support mobile resource recovery options for hard-to-recycle materials, and we would likely make use of this service to safely and properly dispose of hazardous waste, electronics waste, batteries, and paint. Predictable and reliable pickups would be essential for our own planning and to help maximize the cost-effectiveness of the service.

25. Space for Recycling and Composting

The Environmental and Energy Study Institute would support revising the District's Green Building Code to require all new construction and major renovations to include trash, recycling, and compost chutes and ensure sufficient space for on-site waste, recycling, and compost activities. We would likely make use of this service if added to our building as part of a major renovation.

26. Producer Responsibility.

The Environmental and Energy Study Institute hosted an online briefing for policymakers in December 2021 that highlighted a report by Beyond Plastics, "The New Coal: Plastics and Climate Change." We have also researched extended producer responsibility policies that could be beneficial if enacted at the federal level and described the potential of the concept as a climate solution in a number of articles that could be helpful resources. The archived webcast, presentation materials, and written summary notes are available at www.eesi.org/1221waste.

Section 4. Establish Resilient Zero Waste Operations & Infrastructure

28. Zero Waste Hubs.

The Environmental and Energy Study Institute would support large zero waste hubs at high-traffic areas, including Metro and other transit stations, schools, parks, and libraries. Our staff rides Metro or bikes or walks to work, and we often take meetings in parks and outdoor spaces. EESI encourages the Department of Public Works to improve convenient access to large volume bins for trash, recycling, and compost across the District, including in wards that have borne a disproportionate burden of hosting waste processing facilities and accompanying noise and air pollution.

29. Next Gen Fleet.

The Environmental and Energy Study Institute would support the electrification of the Department of Public Works solid waste operations fleet. According to our online Beneficial Electrification Toolkit (www.betoolkit.org), electrified solid waste operations vehicles offer considerable fuel and maintenance savings. For example, an electrified refuse collection truck that drives 25,550 miles per year could cost \$25,141 per year less than a conventional counterpart with an internal combustion engine.

30. Organics Processing.

The Environmental and Energy Study Institute hosted a briefing for policymakers in May 2019 about the benefits of biogas and anaerobic digestion facilities. According to our panelists,

anaerobic digestion facilities could provide natural gas for certain applications and create hydrogen and fertilizer for gardens and farms. The hydrogen captured could also be used to power heavy-duty vehicles that can be used to pick up the waste around the city. An organics processing facility in the District could reduce methane emissions from food waste in landfills and carbon dioxide emissions from incineration. The archived webcast, presentation materials, and written summary notes are available at www.eesi.org/briefings/view/052219biogas.

32. Resilient Operations.

The Environmental and Energy Study Institute encourages the use of on-site renewable energy generation and energy storage to help ensure resilient operations during emergencies and natural disasters.

33. Regional Collaboration.

The Environmental and Energy Study Institute encourages the District to consult with Maryland and Virginia state and local governments and stakeholders to develop a regional approach to expanding zero waste infrastructure, especially when collaboration and coordination would improve cost-effectiveness of Zero Waste DC initiatives.

Section 5. Build an Inclusive & Local Circular Economy

34. Expand Reuse and Repair.

The Environmental and Energy Study Institute supports expanded reuse and repair programs, and we would likely participate by donating unused items and putting the donations of other businesses and nonprofits to good use. These programs would be especially useful when businesses and nonprofits are moving. EESI completed an office move in January 2022, and we would have appreciated and benefited from expanded reuse and repair programs to more easily find new owners for furniture, for example, that our staff no longer needed. In addition, to encourage participation by those without access to cars and trucks, EESI recommends establishing online and telephone options to request pickups of items destined for expanded reuse and repair programs.

35. Expand Donation Sites.

The Environmental and Energy Study Institute would support an expansion of donation drop-off sites, especially when located near Metro and other transit stations, including one or more dedicated to office supplies and equipment. In addition to permanent sites, we encourage the establishment of new designated temporary pickup and dropoff sites, particularly in denser residential and commercial areas of the District, because minimizing the distance between where waste is produced and collected would likely maximize participation by EESI and other organizations.

36. Sharing Economy.

The Environmental and Energy Study Institute supports expanded access to “buy-nothing” groups and online classified ads to connect with local businesses and nonprofits, and we would likely participate occasionally as a buyer, seller, and donor (of items for free).

39. Zero Waste Incubator

The Environmental and Energy Study Institute would likely make use of the proposed reuse store for waste management products and services, especially if it partnered with businesses (including those that participate in the proposed Incubator) that offer complementary services to reduce waste, including discounted refillable and reusable containers.

Section 6. Increase Education and Enforcement Community-wide

44. Public Surveys.

The Environmental and Energy Study Institute would support more regular and frequent opportunities to comment on the Zero Waste DC plan. Given the newness of many potential initiatives, surveys administered every three years (instead of five) could help the Department of Public Works collect and respond to feedback and make the necessary adjustments and to meet the Zero Waste goals.

45. Zero Waste Schools.

The Environmental and Energy Study Institute just held a briefing on waste in schools. Experts on our panel highlighted that school cafeterias could be a classroom where students learn about the impacts of the food system and how much waste is produced in school. According to an estimate by the World Wildlife Federation, schools around the country waste approximately 530,000 tons of food per year. The archived webcast, presentation materials, and written summary notes are available at www.eesi.org/092822school.

Section 7. Protect the Environment for a Cleaner DC

51. Clean-up Events.

The Environmental and Energy Study Institute would participate in city clean-up events. We recently participated in a gardening and landscaping day expertly organized by the Anacostia Watershed Society as a team-building exercise centered on community service. We would happily participate in additional events and encourage the city to develop this type of programming, perhaps in partnership with other organizations with similar activities already underway.