

Thank you for the opportunity to comment on New York's draft scoping plan to achieve the goals of the Climate Leadership and Community Protection Act. I am grateful to the work of the Climate Action Council on creating this document, which includes many strong steps towards addressing climate change and places New York as a leader on climate. To address the waste sector, which accounts for 12% of New York's greenhouse gas emissions, New York must enact policy immediately to reduce landfill waste, divert organic waste, and encourage sustainable use of materials. These policies must equitably serve New York residents. The final scoping plan must:

- **Create a surcharge on landfill waste.** The amendment and expansion of the Food Donation and Food Scraps Recycling Law tackles the organic waste issue at its financial core- that it is relatively cheaper to dispose of organic waste in the landfill than it is to recycle. By imposing a surcharge on landfill waste (making it more expensive) to financially support reduction, reuse and recycling, the price of disposing waste in landfills will be made closer to its real environmental, societal and economic cost.
- **Implement more stringent organics recycling and food donation programs for major food generators.** Stronger programs on major food generators (hospitals, universities, restaurants and supermarkets, etc) is a very efficient way to reduce and recycle organic waste. In addition to targeting the bulk of organic waste in the state, this will also set an example for smaller food generators as well as individuals and households.
- **Expand organics collection programs to multi-family and public housing.** Multi-family and public housing make up a relatively large portion of communities in New York, making it so that they can possibly collectively generate large amounts of organic waste that may be sent to landfills instead of recycled. Thus, expanding outreach and education to this population has potential in inducing effective shifts in organic waste divestment from landfills to organic waste collections. This is also significant in inviting communities who may be disproportionately affected by environmental injustice issues to be included in solutions that may have effects on their lives more strongly than others.
- **Immediately implement “by request only” single-use materials in restaurants.** A statewide “by request only” policy must be administered for single-use items with a requirement of reusable or refillable options. Single-use items, such as utensils and dishware in restaurants, can be phased out in favor of multi-use items that will reduce landfill waste.
- **Rapidly end single-use packaging.** Single-use packaging must be phased out and eliminated in retail stores and other locations, as it contributes to landfill waste consisting largely of non-recyclable material.
- **Expand container deposit programs and incentives for proper recycling.** Container deposits must be increased throughout the state. Increased container deposits

incentivise the collection and recycling of recyclable materials through a comparatively streamlined process.

- **Create a textile waste reduction program.** Not only would a textile waste reduction program reduce methane and CO2 emissions, but it would also reduce both the water waste and water contamination that goes into textile production. This initiative would, overall, promote a sustainable mindset in the textile industry, encouraging the recycling of products created.