

PWIA

Pennsylvania Waste Industries Association
A Chapter of the National Solid Wastes Management Association

September 15, 2009

via e-mail to: epclimatecommittee@state.pa.us

Climate Change Advisory Committee Members
c/o Department of Environmental Protection
Rachel Carson State Office Building
400 Market Street
Harrisburg, PA 17101

**RE: Comments regarding the September 16, 2009 Agenda Action Item:
 Adoption of Targets**

The Pennsylvania Waste Industry Association¹ (PWIA) supports the Commonwealth's initiative to establish work plans and initiatives for the reduction of Greenhouse Gas (GHG) emissions through the year 2025 and beyond. As numerous recommendations of the Climate Change Advisory Committee ("Committee") will directly impact the more than \$3 billion per year contribution to Pennsylvania's economy by the municipal solid waste industry (including nearly 31,500 jobs and \$904 million in annual employee earnings), PWIA has taken a very active interest in the deliberations of the Committee. PWIA commends the Committee for its diligence and efforts in evaluating the GHG work plans and ultimately recommending a number of work plans that have the potential to be effective in meeting the statutory goals of Act 70 of 2008.

PWIA has attended each of the Committee's meetings, and offers the following comments regarding the appropriateness of the Committee recommending a "target" for overall statewide GHG emission reductions.

Initially, we note that contrary to comments made at the last Committee meeting, Act 70 does not require the inclusion of any GHG emission reduction targets in the Committee's recommendations to the Department or in the Climate Change Action Plan ("Action

¹ PWIA is the Pennsylvania chapter of the National Solid Wastes Management Association, a non-profit organization that represents the interests of the North American waste services industry. PWIA members include both privately-held and publicly-traded companies that own and operate numerous commercial solid waste facilities throughout the Commonwealth. In addition to solid waste landfills, our members operate resource recovery facilities, recycling facilities, transfer stations and collection operations. Two of PWIA's primary missions are to advance the safe, efficient, and environmentally responsible management of solid waste, and to promote sound public policy affecting the management of solid waste.

Plan”) to be prepared by the Department. Section 7 of Act 70 sets forth the five proscriptive elements that the Action Plan must include; Act 70 makes no mention of establishing a statewide target for GHG emission reductions.

Secondly, we note that based on information distributed by the Department at the August 14, 2009 Committee meeting and posted on the Committee’s website, that there are a number of states with established GHG action plans that do not have GHG emission reduction targets. Specifically, 30% of states with GHG action plans do not have GHG emission reduction targets (eleven of 37 states with GHG action plans). This is strong evidence that an overall reduction target is not a necessary element of a GHG Action Plan, contrary to opinions expressed at the last Committee meeting.

Finally, and possibly most importantly, while the Intergovernmental Panel on Climate Change has established a recommendation for a global GHG emission reduction level, it has not established a recommendation for any locality, including the Commonwealth of Pennsylvania. The correct GHG emission target for any locality can only be determined based on evaluation of a number of factors, including scientific, technological, demographics and economic. The Committee has focused its efforts, almost exclusively, on the Herculean task of analyzing, debating and, in many cases, approving over sixty work plans. To the extent that the Commonwealth should establish a state-specific target, the Committee has not had an opportunity to evaluate the data that is required to adopt a defensible, credible target.

The Committee has performed a tremendous amount of work in a short period of time—work that will result in a significant decline in GHG emissions across the Commonwealth. This is the Committee’s legacy. An eleventh hour recommendation of a statewide GHG emission reduction target, based on scant evaluation of a very limited set of data is not necessary, and dilutes the credibility the Committee has built through its serious-minded efforts over the last 12 months.

PWIA appreciates the Committee’s willingness to consider this information, and we hope that the Committee leaves the thorny issue of a statewide GHG emission reduction target on its agenda, to be addressed in a substantive and thoughtful manner in the future.

A handwritten signature in blue ink that reads "Mark Hammond" followed by the initials "FOR:".

Mark Hammond for:
Tim O’Donnell
President
Pennsylvania Waste Industries Association