

Divert (Chris Thomas)

I don't really have any formal written testimony. I can certainly provide it in written form, but I just want to address the points I made earlier in Q&A, but also want to address the, the, the comment about source separation and, and having a residual rate. The comment or the last comment or suggested that there's a whole category packaged food that wouldn't be able to be recovered without the packaging. We agree. Without the ability to do that through the packaging, this food is going to the landfill and no one is able to meet the statutory requirements of what HB 2301 and 1799 required us to do. And so from our own experience, when we go from packaged depackaged food only and we we ask grocers, we take on that work. These grocers are telling us and we're seeing that they're increasing the amount that they divert from the landfill by two to four times. And that's simply because a processor that can only take depackaged food is is not able to get an entire category of food and not able to divert it from the landfill. And so when they go to a facility that has the packaging, they're able to get better outcomes because the material that was already in the package form the produce, that kind of thing. And that has rubber bands on it, it has ties, it has stickers on it. And so that's that also needs to be pre processed. Otherwise you have a scenario we are going to have a significant amount of contamination in finished compost products or in finished digestate products. And so if you don't have a means to pre process it, if you don't have a means to address it, then you're going to have contamination. But if you, if you recognize and I'm and I, I've heard the the prior commenter point this out many times. If you recognize that there's a whole category of food that cannot come into a compost facility to begin with, then how is having a recovery rate or having, how is establishing this notion that we cannot accept any packaged food going to solve the problem because you don't. As far as I know in the conversations I've had with composters in the state, vast majority of them are not taking commercial food. And the ones that are including the gentleman who spoke before me has said many times there's, there's entire categories of food that they're simply not able to take because it has it has packaging and they're not willing to invest in pre processing operations to reduce that. So that's one comment. The other comment I made before about going from 5% to 2% on incoming, incoming feedstock, the statutory requirement was not met. The requirement was to improve contamination in incoming feedstock. And when you go from 5% to 2% back to 5%, that is simply not being met. And the state in in its analysis doc did note that it was required. It considered going lower, but realized it would not be meeting the statutory requirements. But then, excuse me, it suggested it was going to remove the incoming limit and then said it considered doing that but realized it wouldn't meet the requirement. But then it just keeps, keeps it the same. So it's not really, it's also not meeting the statutory requirement if it's just simply keeps the incoming feedstock limit the same.