

"To promote a zero-waste society that advocates for **reducing waste**, **sustainably reusing resources and less landfill use**."

January 16, 2023

House of Representatives, Climate and Energy Finance and Policy Committee

RE: House File 7 (Amendments to Public Utility Renewable Energy Objectives)

Dear Chair Acomb and Members of the Committee,

On behalf of the Minnesota Resource Recovery Association (MRRA), I am writing to express our support for renewable energy and environmental justice. I also respectfully request amendments to House File 7 (HF 7; Long) regarding solid waste management. HF 7 promotes landfilling over resource recovery contradicting Minnesota Pollution Control Agency (MPCA) solid waste policy. Since landfilling generates more greenhouse gas emissions than resource recovery, HF 7 would increase carbon emissions from Minnesota's solid waste industry.

The MRRA represents eight resource recovery facilities that process approximately 1 million tons of waste per year in lieu of landfilling. These facilities process waste from 31 of Minnesota's 87 counties. Our mission, vision and purpose statements explain who we are; solid waste management. The sale of electricity is a secondary by-product at some of our facilities (alternatively, many facilities sell steam). Collectively, our facilities produce only 0.75% of the total electricity sold in Minnesota. This contrasts greatly with our management of over 30% of all municipal solid waste (MSW) that hasn't been reused or recycled.

While our facilities represent a very small fraction of the electric public utility market, our emissions still matter. The MPCA and United States Environmental Protection Agency (EPA) carefully track greenhouse gas emissions within the solid waste industry. Like our peers in Europe, both agencies share a longstanding policy preferring resource recovery over landfilling. This policy has been reinforced with recent studies on greenhouse gases emissions as described on the following page.



The following statement is from the Environmental Protection Agency.

Municipal solid waste (MSW) landfills are the third-largest human-generated source of methane emissions in the United States, releasing an estimated 94.2 million metric tons of carbon dioxide (CO2) equivalent (MMTCO2e) to the atmosphere in 2020 alone. With a global warming potential of more than 25 times greater than CO2 and a short (12-year) atmospheric life, methane is a potent greenhouse gas that is a key contributor to global climate change. As a result, reducing methane emissions from MSW landfills is one of the best ways to achieve a near-term beneficial impact in mitigating global climate change.

Source: EPA Landfill Methane Outreach Program (LMOP)

Other things to consider:

- Evidence that waste would be landfilled, "but for resource recovery" can be found in the latest MPCA annual solid waste reports. When the GRE Resource Recovery Facility closed, Waste to Energy processing dropped 265,000 tons per year (2018 to 2020). In the same time period, Landfilling increased 232,000 tons per year. Recycling decreased 110,000 tons per year.
- Counties invested in resource recovery are Minnesota's leaders in solid waste management with some of the highest recycling and composting rates.
 HF 7 hurts Minnesota's solid waste management leaders.
- The State of Minnesota and MRRA's public and private members have invested millions of dollars in resource recovery to comply with MPCA solid waste policy. HF 7 would convert this infrastructrure into stranded assets. <u>HF 7 hurts Minnesota's leaders in solid waste</u> management.
- The State of Minnesota already has nearly \$1 billion in past and future landfill cleanup costs. <u>HF</u>
 7 promotes landfilling and will increase future state landfill cleanup costs.

On behalf of MRRA, I ask that you consider the environmental and climate benefits of resource recovery. I respectfully request HF 7 be revised to prevent public utility policy from interfering with solid waste management policy. Conflation of the two policies will have unintended consequences. The MRRA is happy to provide additional information, resources, or discussion on this important topic. You can reach me at 218-770-2810 or cmcconn@co.ottertail.mn.us.

Sincerely,

Chris McConn, P.E.

MRRA Chair

http://mnresourcerecovery.com/