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Solid Waste Management Bureau  
Attention: Michael Nork, Supervisor of NHDES Materials Management, Education & Planning  
Section  
New Hampshire Department of Environmental Services  
P.O. Box 95  
Concord, NH 03302-0095

Dear Solid Waste Management Bureau and Mr. Nork:

As a resident of New Hampshire, public health professional, and member of the NH Network's Plastics Working Group, I am grateful for this opportunity to comment on the Draft NH Solid Waste Management Plan (SWMP). The plan has many ideas that are sound and important and I commend those who have worked to bring this document forward.

I would like to make 4 points that I hope can help support or improve this plan. (My expanded thoughts and comments are below this list.)

1. I call on the authors to add more details about the harms of plastic in Section I. Introduction.
2. The [NH Network's Plastics Working Group](#) can help with education efforts as mentioned in *Section III. Overarching Themes* in the SWMP.
3. In *Section IV. Goals, Strategies & Actions*, I implore the authors to write SMART goals to support this document. In addition, one way to address *Goal 8* would be to reinstate the *old Action 3.17* from the August 2022 SWMP draft and encourage legislation to implement a beverage deposit return system in NH.
4. In the contents of the SWMP, please include mention of NH hospitals, clinics, and health facilities, so waste produced by said entities is addressed; as in *current Action 3.17*, use the term "Product Stewardship" in place of the term "EPR" to ensure clarity and clear understanding for NH citizens; address microplastics as substances of concern; and consider exploration of a toxins in food packaging law for NH.

### **1. Response to Section I. Introduction**

The Introduction to the SWMP on page 2 does not have enough information about why this plan is so important to the people of New Hampshire, particularly to their health. Here are some thoughts to consider adding to this section of the document to give it the "heart" that Rep. Ebel asked for:

Plastic products, the chemicals involved in their manufacture, and their waste products harm our environment and threaten the health of NH residents. Plastic waste is filling our landfills and increasing waste disposal costs to residents and communities. Recycling is not the solution to these risks but makes people feel less uncomfortable about continuing to use plastic.

Plastic is a "forever" material. It never fully deteriorates but breaks down into microplastics and even smaller nanoplastics. These micro and nanoplastics are now found in soils/terrestrial ecosystems, our marine ecosystems, the air we breathe, and in human placentas, feces, lung

tissue, and cancer tissue specimens. ([Environment International, 2021](#)). Each of us may be ingesting a credit card's equivalent of plastic (5 grams) each week ([WWF International, 2019](#)). These particles may carry any of the 144 chemicals hazardous to human health that are used in manufacturing plastics ([Endocrine Society, 2020](#)).

Plastics clearly endanger the health and well-being of NH residents, our wildlife, and our environment. There is growing evidence that the negative effects of plastic production and disposal are disproportionately borne by low-income communities, communities of color, and indigenous groups, making this also an environmental justice concern. And the risks are increasing.

Less than 9% of plastics are being recycled. Most plastic waste is incinerated (15.8%), buried in landfills (75.5%), or left to litter our environment and deteriorate into micro and nanoplastics ([Consumer Reports, 2021](#)). Single-stream recycling was initiated as a means to make it easier for people to recycle because all recyclables can be combined into home collection bins. However, single streaming increases the rate of contamination of recyclables, so at least 25% of plastic placed in recycling bins ends up in landfills. Many see recycling as it is currently functioning to be aspirational or "wish cycling." It is not effective, but it makes the consumer feel better about continuing to use plastics. Consumer Reports ([2020](#)) depicts recycling as a "Finger in the Dam" with its efficacy being promoted over the last three decades through multimillion-dollar campaigns by plastics manufacturers trying to convince consumers that dealing with plastic disposal is their responsibility. The beverage-container industry lobbyists and the beverage industry have continued to put the burden of recycling on us and this must cease.

## **2. Response to Section III. Overarching Themes in This Plan**

The NH Network Plastics Working Group has been working tirelessly for the last year to educate NH residents by using grassroots educational efforts to help people "rethink plastics." I will do everything I can to help the PWG continue this work. In particular, I believe the PWG can help with 3 of the overarching themes in the SWMP: "reducing and diverting waste," "conducting robust outreach and education," and "addressing climate change and environmental justice." We are doing our best to prioritize our efforts by encouraging

- NH towns and citizens to rethink plastic using the actions in our [Ten Towns • Ten Actions Toolkit](#);
- [restaurants and dry cleaners to find substitutes for plastics](#);
- consumers to [refuse plastics, particularly single-use plastics](#);
- people to utilize [reusables such as reusable bottles and utensils](#);
- citizens to [recycle right](#).

## **3. Response to Section IV. Goals, Strategies & Actions**

I was extremely pleased to see "*Goal 8: Ensure sustainable funding sources to support solid waste management initiatives*" newly added to this version of the SWMP. A NH container deposit system would provide a revenue stream to help fund waste diversion efforts, staffing at NHDES, and other action items detailed in the new plan. Earlier this year, the CRI provided [written testimony in support of HB1652](#) (relative to the recycling of beverage containers), estimating the State could receive up to \$14 million annually in unclaimed deposits.

Over the years, the lobbyists and beverage industry have continued to put the burden of recycling on us. They ignore that strong bottle deposit laws work. According to the Container Recycling Institute (CRI), those States with bottle bills recycle approximately 60% of eligible containers, versus 24% for those like NH without such laws. In Maine, where there is a bottle bill, container recovery has been approximately 90% ([National Resources Council of Maine](#)).

Please consider reinstating Action 3.17 from the previous version of this SWMP, "Explore legislation to implement a beverage deposit return system (bottle bill) in New Hampshire as a method for diverting beverage containers from disposal."

I would like to add one more point about Section IV. The 8 "goals" in the document are not what are considered to be "goals" because they are not SMART, specific, measurable, achievable, realistic, and time-bound. Although the Draft SWMP has "Goals," these "Goals" are not written as measurable nor with a time frame. They probably should be called "Recommended Actions"? Writing SMART goals for the SWMP will increase the likelihood that the actions in this document are carried out.

#### **4. General Comments on Goals and Legislation**

I saw no mention of hospitals and public health facilities in the SWMP, except perhaps related to "sharps." According to [Kathy Gerwig](#), Environmental Stewardship Advisory for Health Care Without Harm/Board Vice Chair, Center for Environmental Health, hospitals generate 29 pounds of waste per bed per day including plastics, paper, cardboard, and food waste. This adds up to a reported [6 million tons of waste annually](#). Rethinking waste at our NH hospitals, clinics, and healthcare facilities could have a huge impact on solid waste reduction in NH.

I was extremely pleased to see Actions 1.8, 2.9, 3.17 because they recommended exploring legislation related to Extended Producer Responsibility (EPR). It would be more clear to NH citizens if you used the term *Product Stewardship* instead of *EPR* in this document. Why do we need product stewardship in NH? Plastic pollution reduction legislation is almost nonexistent at the state level and the lack of enabling legislation means municipalities are reluctant to enact local ordinances. Due to deep budget cuts at the New Hampshire Department of Environmental Services' Solid Waste Management Bureau, NH is seriously behind in solid waste management planning and education. Plastic disposal bans by other states and decisions to stop sending plastics to poor countries may mean more plastics and other solid wastes being sent to New Hampshire. New laws and programs must be put in place to address the economic and public health costs of dealing with solid waste including plastics.

For Actions 2.2 and 2.10, include *microplastics* among the chemicals of concern.

Finally, *Goal 2: Reduce the Toxicity of the Solid Waste Stream* is an important aspect of this document. I would like to recommend efforts in NH to reduce the toxicity of packaging material, particularly food packaging. I point you to Maine's Toxics in Food Packaging Law <https://www.maine.gov/dep/safechem/packaging/index.html>.

Once again, I thank the members of the NH Solid Waste Working Group for their hard work on this comprehensive 10-year Solid Waste Management Plan. I hope you will find helpful ideas during this public comment period and I look forward to seeing the final document.

Sincerely,

Patricia Beffa-Negrini, PhD, RDN