



Comments on Maryland's Climate Pathway: Waste Management

October 16, 2023

Dear Susan E Casey and the Maryland Department of the Environment,

Clean Water Action is a national environmental organization with 53,000 members in the state of Maryland. Our mission is to protect our environment, health, economic well-being and community quality of life. In Maryland, much of our work focuses on solid waste management. We coordinate work to transition Maryland communities away from trash incineration and landfilling toward Zero Waste solutions that are better for our climate, our environment, and our health.

Maryland's draft Climate Pathway report outlines many ambitious goals and strategies for reducing Maryland's greenhouse gas emissions to meet our state's commitments to addressing climate change in sectors spanning the economy. The draft Waste Management section could include much more ambitious and specific goals and strategies to reduce emissions through this sector, which would also have valuable co-benefits in improved public health, climate resiliency, and job creation throughout the state. As Maryland finalizes the Climate Pathway report and moves toward implementation, we urge you to commit to action in the Waste Management sector that will deliver these many benefits for Maryland communities.

Commit to meaningful additional greenhouse gas reduction goals in the Waste Management sector.

The draft report's Additional Policies section makes no specific commitments to additional action or policies that can reduce emissions in the Waste Management sector beyond Maryland's existing policies, simply estimating that unspecified "waste diversion efforts drive an additional 10% reduction from the baseline methane emissions assumed in this sector through 2050," through a small "0.4% annual increase in waste diversion from 2026-2050." This means that, between 2006 and 2031, the draft Climate Pathway report only estimates Maryland achieving 37% greenhouse gas emissions reductions under current policies, and 39% reductions in the Climate Pathway scenario. Much more ambitious goals are achievable. In its landmark report, [*Zero Waste to Zero Emissions: How Reducing Waste is a Climate Gamechanger*](#), the Global Alliance for Incinerator Alternatives finds that "introducing better waste management policies such as waste separation, recycling, and composting could cut total emissions from the waste sector by 84%." Through clear, specific policies and investments in Zero Waste systems,

Maryland can achieve much more significant emissions reductions than 10%, and the final Climate Pathway report must set us on the path to achieving this.

Outline specific Additional Policies to reduce, reuse, recycle, and compost waste, especially through food rescue and organic waste diversion.

Organic waste placed in landfills creates methane, a greenhouse gas that is [25 times more potent](#) at trapping heat than carbon dioxide, thereby driving short-term climate change. As outlined in the draft Climate Pathway report's Current Policies scenario, new state landfill regulations will limit landfill gas methane emissions from organic waste already in place in landfills; but for organic waste discarded in the future, it is much preferable to keep it out of landfills in the first place. Redesigning food systems to reduce food wastage and rescuing usable food that would have been discarded reduces emissions throughout the food system by ensuring that the energy and resources taken to create that food don't go to waste. Diverting organic waste such as food waste to compost [sequesters carbon](#), returning it to the soil instead of releasing it into the atmosphere and improving the carbon sequestration potential of soil. Using the resulting compost will even make Maryland [more resilient to climate change](#): compost improves water retention of soils and slows stormwater runoff. Composting is also good for Maryland's economy: expanding composting and local compost use could support almost 1,400 new full-time jobs in Maryland, according to a [2013 study by the Institute for Local Self Reliance](#). Investing in Maryland's capacity for composting organic waste and enacting specific policies to divert organic waste from Maryland's landfills and incinerators, as well as committing to specific Zero Waste policies throughout the waste sector, will allow Maryland to achieve the much more ambitious greenhouse gas reduction opportunities listed above. These policies should include:

- Investing in composting infrastructure, education, and technical assistance
- Increasing local composting infrastructure
- Supporting farmers producing and using compost
- Expanding organic diversion mandates
- Promoting compost's role in building healthy soils

Through incorporating these and other specific policy recommendations into the Additional Policies section, the final Climate Pathway report can deliver deeper emissions reductions with many valuable co-benefits for Maryland communities.

Commit to ending trash incineration and subsidies for trash incineration in Maryland.

The modeling included in the draft Climate Pathway plan assumes that Maryland's trash incinerators continue emitting greenhouse gasses unchanged through 2050. The final Climate Pathway report must include a transition away from trash incineration in its Additional Policies section, and reflect that commitment in its modeling. Continuing to incinerate our trash is incompatible with climate action and environmental justice. A [recent peer-reviewed analysis in PLOS Climate](#) found that "incinerators emit more greenhouse gas emissions per unit of electricity produced than any other power source," even coal, and that incinerators "also emit

more criteria air pollutants than replacement sources of energy.” As a result, “extending incinerators’ operational lives by 20 years would result in excess emissions of up to 637.7 million tonnes CO₂e, 61.9 million tonnes NO_x, and 161,200 tonnes SO₂. Conversely, a rapid shutdown of existing incinerators would help decarbonize the electric grid and reduce criteria air pollution, particularly in environmental justice communities, which are disproportionately burdened by environmental health hazards.”

Anticipating an end to trash incineration in the final Climate Pathway report would also be aligned with local jurisdictions’ expressed goals for solid waste management. The jurisdictions that host Maryland’s two trash incinerators have both made clear, specific commitments to transitioning away from trash incineration toward Zero Waste within the planning period of the Climate Pathway report. [The Baltimore City Mayor has pledged not to renew](#) the City’s contract with the BRESKO trash incinerator in South Baltimore again. (“Under my administration, we’re going to work to not burn as much at the incinerator as possible. And I will work my butt off to make sure that this is the last time we ever give them a new contract.”) [The Montgomery County Executive has also pledged to close](#) the Dickerson incinerator in South Baltimore in the near future. (“I am writing to inform you that we are beginning to take the steps necessary to change the way Montgomery County handles its solid waste and recycling... The end goal is to close the incinerator within the next 12-18 months.”) Both [Baltimore City](#) and [Montgomery County](#), as well as [Frederick County](#) (which once entered into contracts to build a trash incinerator, but ultimately withdrew from the project in 2014), requested that the General Assembly pass legislation to eliminate “renewable energy” subsidies for trash incineration this year. With local government commitments and support, there is no reason for the final Climate Pathway plan to fail to recommend an end to state support for incineration and a transition away from trash incineration within the planning period.

A commitment to transitioning away from trash incineration would also lead directly to deeper emissions cuts than currently modeled in the draft Climate Pathway report, helping Maryland meet its emissions reduction goals. Particularly after 2030, the report’s modeling demonstrates disproportionately high greenhouse gas emissions from Maryland’s *two* trash incinerators, relative to the emissions from *all* of Maryland’s landfills. Recommending, anticipating, and modeling an end to trash incineration in Maryland will reduce greenhouse gas emissions modeled in the final Climate Pathway report and support climate action, environmental justice, and local government commitments to both.

Do not discount biogenic emissions from trash incinerators.

The draft Climate Pathway report suggests that the state consider partially discounting emissions from incineration “because they come from biogenic sources, therefore are not net emitters.” Adjusting the state’s methodology in this way would be a mistake, creating a false emissions reduction on paper that does not reflect reality. The “biogenic” resources burned in trash incinerators, in large part, are the same resources that could be composted if Maryland invests in robust organic waste diversion infrastructure. Diverting and composting waste is the appropriate means of reducing the emissions from trash incinerators, not changing accounting methodology while carbon from biogenic sources continues to flow out of incinerators’

smokestacks. The referenced EPA policy is widely disputed throughout the solid waste community, and should not change Maryland's accounting methodology.

Notably, in its [2017 Greenhouse Gas Emissions Inventory Report](#), the City of Baltimore referenced this EPA methodology but chose not to follow it, reflecting the full emissions profile of incineration instead:

“The EPA argues that biogenic emissions from trash incineration do not need to be included in greenhouse gas emission inventories because the combustion of organic waste simply returns CO₂ that plants previously absorbed through photosynthesis back to the atmosphere. However, we include both components in our analysis, and we argue that it would be misleading not to do so. The combustion of biogenic waste releases CO₂ directly into the atmosphere, whereas not combusting the biogenic waste would require it to be sent to a landfill. In the landfill, it would naturally decompose and release CH₄ and CO₂ over the next several decades, and those emissions would need to be counted.”

Maryland's final Climate Pathway report should follow Baltimore City's example and eliminate consideration of discounting biogenic emissions from incinerators.

Conclusion

Through clear, specific, and ambitious greenhouse gas reduction goals and policies in the Waste Management sector, Maryland's final Climate Pathway report can set Maryland on a course to deep emissions reductions in the solid waste sector that will also deliver cleaner air and water, improved climate resiliency, economic development, and healthier communities throughout the state.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer Kunze".

Jennifer Kunze
Maryland Organizing Director
Clean Water Action