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the environment for wildlife*

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COMMENTS ON PROPOSED CHANGES TO RPS STANDARDS

Please accept the following comment to the Department of Energy Resources (DOER) from No Fracked Gas in Mass & the Berkshire Environmental Action Team (BEAT). BEAT works to protect the environment for wildlife in support of the natural world that sustains us all. No Fracked Gas in Mass works to stop the expansion of fossil fuel infrastructure in the Northeast states and to promote energy efficiency and sustainable, renewable sources of energy and local, permanent jobs in a clean energy economy.

Key points on why DOER should not weaken the RPS standards:

- Burning trash produces harmful pollutants, such as carbon monoxide, lead, mercury, nitrogen oxides, sulfur oxides, furans, and dioxins. These pollutants can contaminate the air and water in the area surrounding the incinerator. Some pollutants, such as heavy metals, have the potential to affect environments and populations far from the incineration site.¹
- Exposure to the particulate matter produced by trash incineration increases overall mortality, particularly cardiovascular and respiratory mortality, as does exposure to sulfur dioxide.²
- Increasing the amount of energy utilities must purchase from waste-to-energy facilities from 3.5% to 3.7% simply funnels more money into already extant incinerators and provides an incentive to build new incinerators. Living next to old incinerators has been linked to an increased risk in cancer.³
- Burning trash creates its own waste disposal problem in the form of bottom ash and fly ash. Using fly ash and bottom ash as filler material in construction projects can cause

¹"Executive Summary." National Research Council. 2000. *Waste Incineration and Public Health*. Washington, DC: The National Academies Press. <https://www.nap.edu/read/5803/chapter/2#2>

² Lesley Rushton, *Health hazards and waste management*, British Medical Bulletin, Volume 68, Issue 1, December 2003, Pages 183–197 <https://academic.oup.com/bmb/article/68/1/183/421368>

³Porta, Daniela, et al. *Systematic Review of Epidemiological Studies on Health Effects Associated with Management of Solid Waste*. Environmental Health, BioMed Central, 23 Dec. 2009, <https://ehjournal.biomedcentral.com/articles/10.1186/1476-069X-8-60>

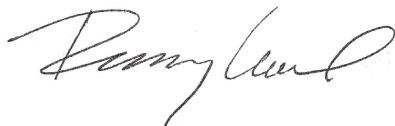
dioxins and other toxic substances to enter surrounding environments through the process of leachate.⁴

- Our goal should be to move toward zero waste. Increasing the amount of energy utilities must purchase from waste-to-energy facilities creates an incentive to keep producing (and burning) trash.
- Massachusetts imports 98% of the wood it consumes.⁵ Importing wood contributes to deforestation in other, more vulnerable places around the world. Effectively using the durable wood products that result from local forestry activities would decrease the amount of wood that Massachusetts would need to import.⁶ Buying local, durable wood products that last for decades sequesters carbon for long periods of time.

Sincerely,



Jane Winn, Executive Director
Berkshire Environmental Action Team



Rosemary Wessel, Program Director
No Fracked Gas in Mass, A Program of Berkshire Environmental Action Team

Prepared by Isabelle Morley, Program Fellow

cc:

Charles Baker, Governor of the Commonwealth of Massachusetts
Kathleen Theoharides, Secretary of Energy and Environmental Affairs

⁴IPEN. "After Incineration: The Toxic Ash Problem ." *IPEN*, 2005,
https://ipen.org/sites/default/files/documents/After_incineration_the_toxic_ash_problem_2015.pdf

⁵ <https://masswoods.org/massachusetts-forests>

⁶Berlik, Mary M., et al. "The Illusion of Preservation: A Global Environmental Argument for the Local Production of Natural Resources." *Journal of Biogeography*, vol. 29, no. 10/11, 2002, pp. 1557–1568. JSTOR, www.jstor.org/stable/827569.