



# Department of Environmental Protection

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## Reduce & Reuse Action Plan – Summary of Comments and Responses December 2021

The Massachusetts Department of Environmental Protection (MassDEP) would like to thank everyone who took the time to provide input into the draft Reduce & Reuse Action Plan. We received many thoughtful comments which have informed a stronger, more effective plan.

Between the comments received from the 42 participants that attended the June 2021 Reduce & Reuse Working Group meeting held online and 17 survey responses, a few themes emerged. Below we have attempted to summarize these themes and how we have incorporated this input into the action plan.

- **Connecting waste to climate change.** Several comments focused on the need to connect our waste reduction efforts to climate change and focus on reduction and reuse of the material streams with the greatest embodied carbon.
  - **Response - MassDEP will:**
    - Partner with the Department of Energy Resources (DOER) to incorporate waste reduction criteria into the Green Communities program.
    - Integrate climate impacts of waste reduction and reuse into educational efforts.
    - Consider a consumption based greenhouse gas (GHG) emissions model to inform which material streams have the greatest embodied carbon and use this data to re-evaluate Reduce & Reuse priorities going forward.
- **Dedicating staff resources for reuse.** To accomplish the reduce and reuse plan, stakeholders requested that the plan explicitly call out the need to dedicate staff resources to work on and coordinate reuse efforts for the Commonwealth.
  - **Response - MassDEP will:**
    - Prioritize staff resources to focus on reduce and reuse initiatives.
- **Expanding our geographic considerations.** In line with the previous consideration of the relationship between waste and climate change; the impacts of waste reduction and reuse do not recognize geographic boundaries. Therefore, several stakeholders commented on the need to incentivize cross-community coordination through our grant

programs and coordinate on reuse programs and policies with other states and countries.

- **Response - MassDEP will:**
  - Promote and support regional reuse programs through technical assistance, grants, and documenting model regional programs.
  - Continue to coordinate with other Northeast states on reuse programs and policies acknowledging that the highest and best reuse or repair opportunities may be outside of state borders.
- **Ensuring accessibility of reuse programs.** Not all residents have equal access to reuse programs throughout the state. Stakeholders requested that MassDEP clarify how we will reach communities and populations that historically have not participated in our programs with a specific focus on environmental justice populations.
  - **Response - MassDEP will:**
    - Translate and disseminate information about MassDEP reuse programs to ensure public facing materials are widely distributed and accessible to all residents of Massachusetts.
    - Conduct market research to better understand the different barriers to waste reduction and reuse behaviors facing communities across the state to inform ways to better engage populations that have historically not participated in MassDEP supported waste reduction and reuse programs.
    - Clarify recent modifications to our grant programs that aim to prioritize funding to environmental justice communities.
- **Setting clear targets.** Numerous comments focused on the need for clearly define targets with a commitment to measure and reevaluate the plan regularly.
  - **Response - MassDEP will:**
    - Consider short, medium, and long term targets for measures we are currently tracking.
    - Explicitly add an action item (short term) to determine any other measures and targets for these other measures.
- **Reevaluate funding priorities.** Many comments focused on how MassDEP grant programs currently incentivize recycling over reuse. Grant programs can be re-evaluated to increase the incentives for communities to adopt reuse programs and provide greater access for businesses promoting circular economy solutions – for example, the Recycling Business Development Grant focuses on target materials which precludes many reuse businesses which cross multiple material streams.
  - **Response - MassDEP will:**
    - Add a reuse category to the RBDG grants focused on funding businesses implementing circular economy solutions in Massachusetts.
    - Re-evaluate SMRP grant program (with a particular focus on RDP) to allocate funding support more towards reduce and reuse initiatives.
    - Consider how MassDEP’s new waste reduction innovation grants can support reduce and reuse activities.
- **Expanding educational considerations.** Several comments focused on ways to reach broader audiences with reuse messaging/education.

- **Response - MassDEP will:**
  - Incorporate reuse into the Green Team materials for K-12 schools.
  - Developing educational materials specifically for municipal stakeholders including maps and graphics that can help municipal officials educate their communities.
  - Evaluate how reduce and reuse messaging can better match the findings of the market research; tapping into motivations for reuse beyond waste reduction.
  - Explore ways to reach younger generations of change makers with educational campaign/PSA.