

February 3, 2010

Matt Hale
Director
Office of Resource Conservation and Recovery
USEPA Headquarters
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Mail Code: 5301P
Washington, DC 20460

Dear Mr. Hale,

The Association of State and Territorial Solid Waste Management Officials (ASTSWMO) appreciates being given the opportunity to work with EPA on the ***Sustainable Materials Management: The Road Ahead*** report (hereinafter "Report"). ASTSWMO would welcome the opportunity to continue to work with EPA to identify pilot projects and opportunities for implementation of the recommendations. The Report is an important reminder that while materials management practices are in their infancy, it is imperative to embrace a strategy that will ensure that they reach maturity. Anyone who reads the Report cannot ignore the consequences of the exponential growth of the human footprint on the earth's environment and resources. The Report reflects a thoughtful and deliberative approach to defining both the problem and innovative recommendations for its resolution.

Similarly, ASTSWMO's 2009 Strategic Plan addresses the need for State waste programs to embrace materials management. The ASTSWMO Board of Director's decision to amend the organization's mission statement is the most obvious evidence of this commitment.

ASTSWMO's new Mission Statement adopts sustainable practices and materials management policies:

To enhance and promote effective State and Territorial programs for waste and materials management, to encourage environmentally sustainable practices and to affect relevant national waste and materials management policies.

As responsible managers of State waste programs, the Board also emphasized in the Strategic Plan that incorporating materials management and sustainability into the traditional waste management programs must be done in a way that does not dilute the focus on core programs, such as corrective action, permitting, enforcement, and inspection. In Chapter 1, the Report affirms this view by recognizing that the steps that EPA and State environmental

agencies can take to promote integrated materials management must **“build on current programs including core regulatory programs.”**

As demonstrated so clearly in the Report, the reality is that materials use is increasing. Recognizing this escalation, State waste programs cannot abandon diligent attention to core waste programs which are so vital to protecting human health and the environment. Simultaneously, ASTSWMO’s Strategic Plan acknowledges the role that State waste program must play in striving to achieve the goals of the Report.

The products that will be generated through the implementation of the Report’s recommendations will be instrumental in achieving sustainable materials management. ASTSWMO and its member States are committed to assist in this effort, to the extent feasible considering the negative effect that the current economic downturn has had on State waste program funds.

ASTSWMO and its members are already engaged in some of the actions identified in the Report’s recommendations. As an organization, ASTSWMO is well positioned to accomplish some of the actions outlined in the Report recommendations:

1. Promote efforts to manage materials and products on a life-cycle basis. [A]gencies should incorporate materials management as an important strategic approach for addressing climate change and other environmental challenges.

ASTSWMO’s Sustainability Subcommittee’s “Greening State Government Task” Force is engaged in assessing and promoting State practices. After all, both State and the federal governments must lead by example.

2. Build capacity and integrate materials management approaches in existing government programs. EPA and state environmental agencies must ensure the availability of data and decision tools needed to support life-cycle materials management, including necessary research.

ASTSWMO’s Sustainability Subcommittee’s Product Stewardship Task Force developed the Product Stewardship Framework Policy Document to serve as guidance in the development of State policies that address the environmental impact of products particularly as States transition from a focus on individual products to a more comprehensive and consistent product stewardship framework approach.

3. Accelerate the broad, ongoing public dialogue on life-cycle materials management.

Governments alone cannot bring about the shift to life-cycle materials management.

ASTSWMO’s Strategic Plan’s **Strategic Focus Area #4** is devoted to developing, maintaining and strengthening existing partnerships and forging new partnerships to support ASTSWMO’s mission which now includes encouraging sustainable practices and materials management policies. ASTSWMO is committed to creating new partnerships with other federal agencies, local governments, other environmental media associations, and with the private and non-profit sectors that are critical to accomplishing the goals of the Report.

While ASTSWMO's commitment to the Report's goals is strong, its members cannot lose sight of their responsibility to ensure that current core programs remain strong. In order to expand their focus, State waste programs will need the support of federal and State legislative bodies to provide resources and incentives to foster sustainable materials management practices. This is a reality that cannot be ignored in light of current State fiscal constraints, particularly diminishing State waste program resources. In order to achieve this, members of legislative bodies must also become educated partners.

ASTSWMO commends the authors of *Sustainable Materials Management: The Road Ahead* for making a compelling case to strive to achieve sustainable materials management and a roadmap to get there. Although facing constraints that will inhibit States' abilities to immediately adopt all of the recommendations, ASTSWMO endorses the Report and will continue to pursue its goals through implementation of its Strategic Plan.

Sincerely,

A handwritten signature in blue ink that reads "Gary Baughman". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Gary Baughman
President, ASTSWMO