0:0:0.0 --> 0:0:4.850  
ANR - Catamount NL D215  
Yeah. OK. Alright. Open Steve and Dan and Mike and.

0:0:6.270 --> 0:0:22.880  
ANR - Catamount NL D215  
Billy Connolly is fast with US online and we just, Aaron Siegrist can't be here today. She's she's double, triple booked with a bunch of events. Tom Gilbertson traffic, but he says he's on his way. And Jenna, we're hoping she to see her join probably remotely soon.

0:0:25.80 --> 0:0:33.310  
ANR - Catamount NL D215  
For folks listening in on Josh Kelly with the solid waste program, I I think we've we've got pretty much a similar cast of folks.

0:0:35.300 --> 0:0:46.710  
ANR - Catamount NL D215  
Joining remotely and certainly around the table, we've got Morgan here from agency of AG. Hi, Morgan. I'm just sort of trying to keep us going and not do introductions every single time, so we get bogged down by that.

0:0:48.200 --> 0:1:16.60  
ANR - Catamount NL D215  
So today's meeting is a focus on the food recovery management hierarchy and to frame it for everybody here, the charge and statute in Act 170 is for this participant group to make any recommendations on whether the organics management hierarchy should apply to each generator of organic waste. We had some conversations last time about, like, what does that mean?

0:1:16.800 --> 0:1:17.250  
ANR - Catamount NL D215  
1.

0:1:18.450 --> 0:1:20.900  
ANR - Catamount NL D215  
And I think we're gonna get into some of that today.

0:1:22.410 --> 0:1:37.920  
ANR - Catamount NL D215  
I would like to turn it over to Ben to just do some housekeeping stuff 1st and also update you all on research, right? Yeah. Thanks, Josh. So so last week when we we met, we were trying to find a way for folks to share files and to.

0:1:38.630 --> 0:1:46.660  
ANR - Catamount NL D215  
Select all the data and research and reports that are going to be compiled and used for the the group process. The solution we came up with versus.

0:1:48.290 --> 0:2:18.210  
ANR - Catamount NL D215  
The social meme up with the FTP site which we sent everybody the login instructions of this week and it sounds like most folks that have tried have been able to get in there might not have been anything posted there when you first entered in, but but there's more documents being uploaded there now. Going forward, we just gonna put everything that we put together for working documents and any research stuff that's requested right there will probably copy the meeting recordings and stuff there as well. But it's better than posting online because if someone request something posted online, it has to go through us.

0:2:18.310 --> 0:2:27.350  
ANR - Catamount NL D215  
In our web team to get it posted and it's just kind of a bottleneck that's unnecessary. So now everybody has access. We actually don't share it with with outside entities, but.

0:2:28.550 --> 0:2:45.160  
ANR - Catamount NL D215  
But all the seven stakeholders can share things and and upload stuff and and share documents that way. So let us know if you have any hiccups there. It's not something that we have direct control over. It's our IT and the third party service I believe so. But I can help work through any issues if people have those.

0:2:45.760 --> 0:3:16.890  
ANR - Catamount NL D215  
Umm, the other thing we were asked to do in the meantime, following last week's meeting, was to look into which other states have incorporated a food residuals hierarchy into their law. So I did a quick look, admittedly sifting through 50 states, regulations and statutes is a long task, but I took a quick dive. I started with the states, the nine states that have food waste disposal bans and started with those. It doesn't look like in my research, any of those states had a hierarchy that they.

0:3:17.40 --> 0:3:18.490  
ANR - Catamount NL D215  
Wait, our statute?

0:3:19.660 --> 0:3:39.390  
ANR - Catamount NL D215  
The one state that did have a hierarchy that I found that was incorporated into law was made that I think that was because they were pretty quickly after us. It kind of mirrored some of our words. They have a hierarchy in law for food waste recovery and they say it's the IT is our policy. So it's the exact same boat that we're in terms of their language in that section.

0:3:40.710 --> 0:3:48.260  
ANR - Catamount NL D215  
Some of the other states do have other requirements outside of a traditional EPA hierarchy, like New York, for example, they built a structure.

0:3:49.500 --> 0:4:18.340  
ANR - Catamount NL D215  
Essentially requiring generators to donate food and then to recycle food scraps if they're within 25 miles of a facility. So that might be a state we could look to for. How are you requiring food donation? So that's one we could flag to look into a little closer. New York State. Yeah. All this. All my notes have been compiled in an Excel spreadsheet that's been uploaded to the FTP site so people can take a look there. There's links to the law. There's links to the the general informational website. It's not.

0:4:18.410 --> 0:4:28.210  
ANR - Catamount NL D215  
Complete by any means, but it's a start to get us to get us started. The other interesting one was Washington State, which is the most recent food waste ban.

0:4:29.370 --> 0:4:39.960  
ANR - Catamount NL D215  
But they took a different route and versus having the hierarchy which most people, which is kind of an older take of the the solid waste hierarchy for people that have been in solid waste for a long time.

0:4:41.750 --> 0:4:49.220  
ANR - Catamount NL D215  
Washington took a different route. It seemed like they were rather than sort of taking the hierarchy approach and focusing on end of life uses for things they took.

0:4:50.440 --> 0:5:13.540  
ANR - Catamount NL D215  
They essentially created a they're lost, establishes a Center for sustainable food management to coordinate this stuff, and they're looking at it as a life cycle analysis approach. So they're gonna be doing a much broader that that entity is gonna be doing a much broader look at food waste recycling than just the hierarchy does. So it seems like people are transitioning from the hierarchy to more of a life cycle analysis of the materials.

0:5:14.790 --> 0:5:34.950  
ANR - Catamount NL D215  
So the hierarchy that we're following might be a little dated in that, but that's it in a nutshell. All the notes are in the Excel spreadsheet that everyone should be able to access. Let me know if you can't, but we can talk more if we wanna have other states come and present or or chime in by e-mail, we can talk more about that later. Right. Thanks Ben.

0:5:35.680 --> 0:5:39.350  
ANR - Catamount NL D215  
Umm Tom for just for for you just joined us and I don't know if, Jenna.

0:5:40.540 --> 0:5:42.140  
ANR - Catamount NL D215  
I don't see Jenny's name yet.

0:5:44.510 --> 0:5:53.840  
ANR - Catamount NL D215  
Ben was talking about the FTP site that he's got set up for documents and everything, and so there's a lot of good stuff starting to populate there and you can put stuff there too, as can anybody in just.

0:5:55.560 --> 0:6:10.210  
ANR - Catamount NL D215  
And that's where we also minutes and things like just housekeeping will end up to or can I think my preference is to post minutes to the website just so the public has that record of the agenda and the minutes and stuff and not bogged down. I sort of see this as the working folder for people to share.

0:6:11.500 --> 0:6:20.340  
ANR - Catamount NL D215  
Just stuff I can post in there redundantly if people prefer, but I'd prefer them just keep it clean and posting to the website so everyone can see you. Yeah, that's OK.

0:6:22.680 --> 0:6:54.110  
ANR - Catamount NL D215  
Umm, so we we started a little late. We started around 5 minutes after talked about the main meeting topic for today and this is a we put this standard together after last times meeting and I don't think that was Mia got any significant comments on it. So we just proceeded you guys can feel free to change the direction if you'd like. Main meeting topic as we discussed last time as the Food recovery management hierarchy and the charge of the group is recommendations on whether organics whether the organics management hierarchy.

0:6:54.270 --> 0:7:14.260  
ANR - Catamount NL D215  
Should apply to each generator of organic waste. Last time we discussed kind of going around and getting experiences from people and also having a couple of speakers in Matt Chapman's here today, Division director of the Waste Management Prevention division, Peter Blair, is online and prep to to share their perspectives.

0:7:15.380 --> 0:7:27.370  
ANR - Catamount NL D215  
And I will do for I will do a experience from DC solid waste program in the implementation of the and application of the hierarchy that we've experienced since the law went into effect.

0:7:29.210 --> 0:7:41.600  
ANR - Catamount NL D215  
So so I'll I'll try and be brief and I'm I'm not always good at that, but I'll do my best. We we started with the 50 plus page law in around 2013. me and I both came on around that time.

0:7:42.960 --> 0:8:1.700  
ANR - Catamount NL D215  
Working under Cathy Jameson and our review initially of the hierarchy and in talking with our supervisor at the time was that it was a. It was a recommendation. It was not a hard enforceable piece of statute. And so we began.

0:8:2.780 --> 0:8:14.950  
ANR - Catamount NL D215  
We began actually really with our outreach on the people who are gonna be impacted first by the law. So in the case of the ban on recyclables, we went to haulers and facilities and met with them and met with solid waste districts and.

0:8:16.170 --> 0:8:29.840  
ANR - Catamount NL D215  
And then started out moving outward from there and people might recall that one of the first parts of the law was the the two-tone generator band, which started in 2014. We actually had a meeting not in this room, but I think.

0:8:30.960 --> 0:8:48.540  
ANR - Catamount NL D215  
Another room upstairs with the Retail Grocers Association and met with them and talked about 2 tone generators and how much do you produce and how do you measure food waste and the best guesses we had for measuring food waste. That meeting I believe that was in about 2014.

0:8:50.310 --> 0:8:55.240  
ANR - Catamount NL D215  
And Price Chopper was there. Shaws was there. I think there was representatives from at least one coop.

0:8:57.60 --> 0:9:2.600  
ANR - Catamount NL D215  
Hannaford, I think Senate representative, there was a TOPS representative at that meeting tops market.

0:9:4.760 --> 0:9:13.500  
ANR - Catamount NL D215  
And it was pretty general. It was. It was mostly about what was coming with this law and what were the available services at that time.

0:9:16.220 --> 0:9:46.130  
ANR - Catamount NL D215  
And and I don't recall if we specifically talked about the options in the hierarchy at that time. To be honest, it was, it was multiple years ago, but in since then we have initiated direct business outreach. We've had some media campaigns. We've we've done an entire websites suite of materials and have partnered with the Agency of Agriculture on animal feeding information and met many times with staff. Morgan and Steve weren't part of that staff initially.

0:9:47.380 --> 0:9:49.710  
ANR - Catamount NL D215  
We we worked 2.

0:9:50.880 --> 0:9:52.890  
ANR - Catamount NL D215  
Get clarity on.

0:9:54.420 --> 0:10:2.410  
ANR - Catamount NL D215  
Both the food donation to people side from the Department of Health, Food and Lodging Program, we met with their.

0:10:3.80 --> 0:10:5.970  
ANR - Catamount NL D215  
Uh inspectors that are health inspectors twice.

0:10:7.300 --> 0:10:29.980  
ANR - Catamount NL D215  
To clarify, you know what the law is and also to offer our services in the materials management section of the solid waste program for basically for outreach. So if there were concerns about you know with with the main concern was humans getting unsuitable food that had been left out or was past its.

0:10:31.340 --> 0:10:36.830  
ANR - Catamount NL D215  
Yeah, it's quality date and I'll say quality date because sell by dates are not always accurate for food quality.

0:10:39.310 --> 0:11:9.660  
ANR - Catamount NL D215  
So we we even had a meeting where we brought in with the solid Waste districts alliance as an independent towns, the Agency of Agriculture and Department of Health to because they were going to be doing outreach on the law directly in their own communities to restaurants, to supermarkets, food based businesses. And we were seeing a lot of peak feeding at the time. And so we wanted to have the was Kristen Hoss, the state veterinarian who came.

0:11:9.920 --> 0:11:20.130  
ANR - Catamount NL D215  
And she directly discussed what's allowed, what's not allowed, and also we we touched on chicken foraging a little bit, but not in a lot of detail at that time there wasn't.

0:11:21.470 --> 0:11:29.570  
ANR - Catamount NL D215  
As much concern as as has bubbled up in previous years, I think the FDA fisma Food Safety Modernization Act hadn't quite hit with such.

0:11:31.340 --> 0:11:34.220  
ANR - Catamount NL D215  
That's such an impact in the United States and so.

0:11:35.740 --> 0:11:47.240  
ANR - Catamount NL D215  
It was a it was a meeting more or less about how best to donate quality food to for people with Department of Health there, the food and Lodging Float program. That was Liz Warsing, who's still there.

0:11:48.180 --> 0:11:51.830  
ANR - Catamount NL D215  
I believe and and Kristen, Hoss or and will be exception.

0:11:53.130 --> 0:11:58.850  
ANR - Catamount NL D215  
So we've done a lot of collaboration, a lot of support, a lot of.

0:11:59.540 --> 0:12:7.500  
ANR - Catamount NL D215  
Working with our sister agencies because there are so many different laws that apply to this topic and solid waste regulation is just one of those.

0:12:9.770 --> 0:12:20.530  
ANR - Catamount NL D215  
I just wanna be bank. Yeah, that with the Food bank, a lot of work with the Food Bank and other food rescue organizations on donation. And then in doing business outreach and then connecting with all the different.

0:12:21.440 --> 0:12:23.710  
ANR - Catamount NL D215  
Retail grocers or Hospital Association.

0:12:25.70 --> 0:12:33.710  
ANR - Catamount NL D215  
The food recovery hierarchy was always a part of that conversation, and when we do direct business outreach too. Yeah, connecting businesses if there is an option to building.

0:12:36.210 --> 0:12:44.780  
ANR - Catamount NL D215  
We've also done local, regional and national webinars on the food waste ban in Vermont that have included the hierarchy and.

0:12:46.40 --> 0:12:52.930  
ANR - Catamount NL D215  
Those have also targeted the retail grocers section at least twice. We did webinars from that 2014 in person meeting. We did webinars as well.

0:12:54.670 --> 0:13:7.820  
ANR - Catamount NL D215  
We created business outreach handout materials that when we would go out in person, we would hand out materials suggesting to how businesses can manage food waste separately from trash and that included hierarchy principles.

0:13:9.630 --> 0:13:19.720  
ANR - Catamount NL D215  
We even updated our hierarchy image to have an arrow on it for most preferred to least preferred. That was something we changed so that people would understand what the triangle meant in terms of priority.

0:13:22.250 --> 0:13:28.160  
ANR - Catamount NL D215  
And I know I'm missing a lot of a lot of things here sort of things. I was thinking of.

0:13:33.800 --> 0:13:34.510  
ANR - Catamount NL D215  
Yeah.

0:13:36.110 --> 0:13:45.430  
ANR - Catamount NL D215  
Yeah, there's there's more. There's many more groups that we partnered with over the years, but I think that is the one for school donation guidance. Yep.

0:13:46.750 --> 0:13:49.960  
ANR - Catamount NL D215  
Umm, share tables. We worked with Agency of add-on share tables.

0:13:52.140 --> 0:14:22.900  
ANR - Catamount NL D215  
Uh guidance to promote the donation of food. Ohh, I'd know what I want to say. The Composting Association of Vermont has been a long time collaborator and partner. They as many folks know, put on the Vermont Organics recycling summit most years. There was one year they weren't the contractor for that group, but we've worked with them on what this meant and have always been sharing and what our outreach materials are with them. And in clear that it's a priority and that we prioritize those uses. So I think that's.

0:14:23.10 --> 0:14:27.770  
ANR - Catamount NL D215  
About the summary I have and I think I'll take any questions or yeah.

0:14:29.640 --> 0:14:31.980  
ANR - Catamount NL D215  
Go to the go to speakers next if you want.

0:14:36.320 --> 0:14:48.670  
ANR - Catamount NL D215  
I'm wondering what like what the process was and with the draft policy being so different from what's accepted now, how that came to be so 2019 that was given to us last week.

0:14:49.620 --> 0:14:50.80  
ANR - Catamount NL D215  
Umm.

0:14:51.160 --> 0:14:54.170  
ANR - Catamount NL D215  
Is that was that internal disagreement or was that?

0:14:55.150 --> 0:15:1.0  
ANR - Catamount NL D215  
On source separation or the food management hierarchy on the food management hierarchy, including the source separation, yeah.

0:15:2.800 --> 0:15:10.710  
ANR - Catamount NL D215  
It's also wanted to say that I believe there was a draft prior to this, one that was even more explicitly at odds with the current interpretation.

0:15:12.30 --> 0:15:22.610  
ANR - Catamount NL D215  
That. Yeah, yeah. I'm, I'm. I too am. I felt like there was a trajectory change in the interpretation. And given the explicitness of the language.

0:15:23.430 --> 0:15:26.70  
ANR - Catamount NL D215  
I'm curious if there was a sort of a definitive.

0:15:27.890 --> 0:15:32.860  
ANR - Catamount NL D215  
Conversation around you know how to actually interpret that.

0:15:34.790 --> 0:15:55.0  
ANR - Catamount NL D215  
Not my will, but quick question. I mean this, did you guys think that these questions pertain to the hierarchy itself or to the cause there's a second charge that we'll be talking about in the future, that's all about the policy, right? So I'm wondering if this might be the policy being sourced separation or the which policy well, the second charge it should we modify the existing policy surrounding source separation of waste, right?

0:15:56.180 --> 0:16:13.480  
ANR - Catamount NL D215  
I'm just wondering if it would be better to discuss those then and just focus on the hierarchy today and stay kind of on topic. The first charge and yeah, that makes sense or sure. I mean my recollection, Dan and Tom, is that there wasn't a lot of discussion about the hierarchy when we were discussing.

0:16:14.900 --> 0:16:17.640  
ANR - Catamount NL D215  
The policy document was a lot on source separation.

0:16:19.970 --> 0:16:24.700  
ANR - Catamount NL D215  
I could be wrong, I haven't reread the draft that you guys are looking at and in detail.

0:16:26.810 --> 0:16:44.410  
ANR - Catamount NL D215  
But that was much less of an issue that's been that was sort of my sense too. I think it pertains more to source separation, the hierarchy itself, but right, OK, yeah, we can we can pick that up. I think that does. So go ahead. The last thing is like, again, I should look back at what their policy document said. They could address this.

0:16:46.240 --> 0:16:48.630  
ANR - Catamount NL D215  
The hierarchy and has really direct way.

0:16:50.190 --> 0:16:53.760  
ANR - Catamount NL D215  
Maybe it does like it's been thinking it's been a while since I've looked at it.

0:16:56.490 --> 0:17:3.640  
ANR - Catamount NL D215  
Yeah, it does. It does. There's a under implementation, helpful options included in management, higher management for residuals.

0:17:6.200 --> 0:17:9.780  
ANR - Catamount NL D215  
But again, it was really a heavily unsourced separation.

0:17:12.220 --> 0:17:16.460  
ANR - Catamount NL D215  
I have a question for the group just looking towards having our guest speakers.

0:17:17.290 --> 0:17:17.710  
ANR - Catamount NL D215  
Umm.

0:17:18.900 --> 0:17:30.420  
ANR - Catamount NL D215  
Is this a good time to sort of make that transition that, yeah, since we're short on time in the overall timeline of the whole process, I I'm guessing that it's unlikely that we'll.

0:17:31.160 --> 0:17:36.480  
ANR - Catamount NL D215  
Ask the same speakers to come in on multiple topics like source separation later.

0:17:39.260 --> 0:17:47.790  
ANR - Catamount NL D215  
That's my assumption. If that's wrong, we can check that, but I think we're gonna be hard pressed to fit in as many people as we'd like. So I wonder if today.

0:17:48.750 --> 0:17:57.720  
ANR - Catamount NL D215  
While we have Matt and Peter here, if it's if it's a good time for us to make sure we ask questions pertaining to all three of the legislative questions.

0:18:0.300 --> 0:18:3.340  
ANR - Catamount NL D215  
That they that may be pertinent to to the legal analysis of it.

0:18:6.680 --> 0:18:12.750  
ANR - Catamount NL D215  
Umm, I guess I would say if we have I can appreciate that line of thought I.

0:18:13.880 --> 0:18:35.300  
ANR - Catamount NL D215  
Don't wanna speak to that or Peter, but I have to think if we ask someone to come back, they might be able to make themselves to go ahead and consider is the our time of inability to have redundant presentations when we probably have a pretty long list of people would like to hear from all together. Yeah. And I mean, I think this is gonna be the struggle we're kind of faced with is trying to balance like where do we start and.

0:18:36.310 --> 0:18:37.950  
ANR - Catamount NL D215  
How do we move forward so I mean?

0:18:38.940 --> 0:18:41.670  
ANR - Catamount NL D215  
I think if we work on this first charge today.

0:18:42.950 --> 0:18:47.40  
ANR - Catamount NL D215  
Try and get some headway on that and then circle back to the other.

0:18:47.700 --> 0:19:0.380  
ANR - Catamount NL D215  
Two charges at later dates and if Matt and Peter and other witnesses need to come back in like, I think we asked them if they could come back in, I would say try and just keep it focused on this, but I don't know what other members of the group.

0:19:2.800 --> 0:19:4.370  
ANR - Catamount NL D215  
Yeah, I don't have a great sense of.

0:19:5.540 --> 0:19:11.60  
ANR - Catamount NL D215  
How many people are are in the next like in our next meeting, how we've got lined up? I think we're a little.

0:19:11.870 --> 0:19:13.440  
ANR - Catamount NL D215  
Maybe behind on that but.

0:19:15.830 --> 0:19:26.950  
ANR - Catamount NL D215  
Yeah, they're the time allows today I think could be, you know, if we got extra time then why not? But but I presume it Matt and Peter are both willing to come back that if we felt it was priority.

0:19:27.590 --> 0:19:28.140  
ANR - Catamount NL D215  
That we could.

0:19:28.890 --> 0:19:31.190  
ANR - Catamount NL D215  
We could, you know, bring them back.

0:19:32.230 --> 0:19:35.580  
ANR - Catamount NL D215  
Did you get like a rough tally on topic experts?

0:19:36.210 --> 0:19:53.850  
ANR - Catamount NL D215  
From all of us, total number. Yeah, like ballpark. I haven't been this in the spreadsheet that I posted. I don't know if I ever counted. I mean, I must have submitted a dozen to you alone. Probably. Yeah, yeah, probably in the five to 10 range. Yeah. I think there's probably around 20 total. OK. So, I mean, my quick math is we have basically.

0:19:54.700 --> 0:20:9.90  
ANR - Catamount NL D215  
Right now, scheduled to and hopefully three other meetings to take that testimony, if we Max out it kind of three on average, maybe four, we're still not at that full list. So I think we're gonna be kind of fighting for real estate on the time.

0:20:9.760 --> 0:20:16.930  
ANR - Catamount NL D215  
So I I think we can prioritize Deepak today, because that's what we've sort of focused on in high regard or rather hierarchy. Thank you.

0:20:17.10 --> 0:20:48.920  
ANR - Catamount NL D215  
The but I think if we can fit in some of those other questions so that we can, because I think both Matt and Peter's input is probably some of the most key input that we're gonna get. And I think too like our goal with the agenda was to try to get some bullet points for this first charge just to get some traction and some headway and sort of it seemed like most relatively simple one. So maybe we could get those bullet points of group consensus down from this discussion in this meeting today and then dive into some of the other discussion going forward. There's a lot of stuff we have to work out like Dan was mentioning who's coming and when.

0:20:49.620 --> 0:21:13.170  
ANR - Catamount NL D215  
One of those meetings scheduled and we can work on that hopefully between meetings, but the discussion has to happen between meetings, right? We have to get feedback from the stakeholders to make that happen. But I think if I had a preference, I would try to get through this charge now and if there's overflow time, maybe we can go there. The one thing I did want to point out was match the division director for our division now. And if we wanted to have.

0:21:14.70 --> 0:21:44.950  
ANR - Catamount NL D215  
People representation for for PC we can always coordinate that, but I doubt that would be made in this current wrong. I don't speak for you Matt, cause well. I mean. So yeah, I mean that's I mean, I'm happy to just like sort of you know begin the transition in the interest of time right like in jump in and I I know a lot of people around the room but just for those who don't know me. My name's Matt Chapman. I've worked for the agency for about 20 years at this point. 19 of those 20 years has been as an attorney within the agency both as a program attorney.

0:21:45.100 --> 0:21:55.230  
ANR - Catamount NL D215  
Starting with the waste management division and then I've been both the DC and A&R general counsel and so I'm not in that role anymore. And I and I also I guess I would say.

0:21:56.10 --> 0:21:56.550  
ANR - Catamount NL D215  
You know.

0:21:58.300 --> 0:22:4.470  
ANR - Catamount NL D215  
I I think and this is my single perspective of things that.

0:22:4.550 --> 0:22:34.500  
ANR - Catamount NL D215  
Ohh, the greatest value that this group can give is not like what is, but what ought to be right. Looking at both the law and the recommendations to the legislature to either improve or clarify the hierarchy and source separation to accomplish the goals we I think collectively all share with respect to improving the organics management system in the state of Vermont, making sure it is as clean and.

0:22:34.580 --> 0:23:7.670  
ANR - Catamount NL D215  
And uncontaminated as possible at the end of the day. Right. So I think that that I'm not. I saw Peters, you know Wong memo this morning. I'm not gonna kind of go point by point with Peter, because I mean, there's lots of things. I just in scanning it, I don't necessarily agree with. But I also think you should be thinking forward-looking and policy driven because ultimately this is a report that goes back to the legislature to say, you know should, should the legislature be directing the Agency to change its policy.

0:23:7.830 --> 0:23:9.760  
ANR - Catamount NL D215  
And why and how will that work?

0:23:10.560 --> 0:23:26.280  
ANR - Catamount NL D215  
And so I think that's with your collective like experience in the world working in these things. It's an incredibly valuable window to both the agency and to the legislature to basically say, yeah, sure, the way you should change it out and and improve the system.

0:23:26.930 --> 0:23:28.420  
ANR - Catamount NL D215  
So I mean, are you?

0:23:29.360 --> 0:23:38.630  
ANR - Catamount NL D215  
That the one no. I was just gonna sit elsewhere so that you don't have to corrections. And I guess to that end, I would just say I agree. But I I think we have plenty of people on the.

0:23:40.290 --> 0:23:50.460  
ANR - Catamount NL D215  
The meeting in here. Hi there. Yeah, we've had it reserved. It must be a computer glitch. OK. Yeah. Yeah, we've had it for about 3 weeks, but.

0:23:51.160 --> 0:24:14.680  
ANR - Catamount NL D215  
OK. Yeah, got it for a couple months, but yeah, this is the regular, OK. I would encourage us to look back enough so that the whole committee hasn't understandable totally. And and I don't I don't think I think that and absolutely and I certainly am willing to like and what I thought I would do is basically have a conversation around the historical perspective right now working with the legislature in 2011 adopting.

0:24:15.750 --> 0:24:44.980  
ANR - Catamount NL D215  
Great. And, you know, prefacing things with the, you know, it's my recollection of the conversations that took place in 2011. All, you know, 11 years ago and and some of the conversations around both, you know, the enactment of 140 pack 148 and and what the legislation was thinking and how they were approaching universal recycling at the time, because I think some of that context helps inform, you know.

0:24:45.60 --> 0:24:51.110  
ANR - Catamount NL D215  
The interpretation of of general or specific provisions within ACT 148.

0:24:53.720 --> 0:24:57.270  
ANR - Catamount NL D215  
So I mean, going back, you know, 11 years ago, I mean.

0:24:58.180 --> 0:24:59.280  
ANR - Catamount NL D215  
We uh.

0:25:1.600 --> 0:25:2.110  
ANR - Catamount NL D215  
We.

0:25:3.440 --> 0:25:26.770  
ANR - Catamount NL D215  
Where the world was a much different place, right? Like there were. There were very few places that had organics, bands from the landfill. I mean, we're no state. There were a couple of countries in Europe who had done it at that point. And and there was some traction as far as it starting in some of the major West Coast cities like San Francisco.

0:25:29.290 --> 0:25:43.50  
ANR - Catamount NL D215  
There was a desire or a concern by several of the leadership positions, Tony Klein specifically about limited landfill capacity in the state and the need to expand and limited landfill capacity generally throughout the United States.

0:25:44.690 --> 0:25:57.410  
ANR - Catamount NL D215  
The the the sort of Northeast region and the need to conserve that landfill capacity. So that's sort of the the preface and the fact that really there had not been a look at solid ways since 1987.

0:25:58.830 --> 0:26:1.340  
ANR - Catamount NL D215  
When we first passed the Waste Management Act.

0:26:2.420 --> 0:26:2.950  
ANR - Catamount NL D215  
So.

0:26:3.570 --> 0:26:12.910  
ANR - Catamount NL D215  
So that's sort of the the background for it. I mean, conceptually, when they when they, when the legislature went in and and did this, if you looked at at 148.

0:26:14.330 --> 0:26:21.360  
ANR - Catamount NL D215  
Yeah, and both it's it's it's work through the committees and it's ultimate adoption. A lot of it was was based on.

0:26:23.130 --> 0:26:40.300  
ANR - Catamount NL D215  
Setting in larger level state policy goals with long time frames to allow markets to adjust, and that's in those small part what the committee would sort of oriented towards doing, which is setting long term policy setting up higher level objectives.

0:26:41.750 --> 0:26:49.190  
ANR - Catamount NL D215  
Wedding markets adjust to those objectives trying to have the the agency and and then there were some key things as far as.

0:26:49.980 --> 0:27:11.420  
ANR - Catamount NL D215  
Yeah. Again, before 2011, there was very little, not not none, but very little unit based pricing taking place in the state of Vermont. So that that became a requirement. And then the concept of rolling you know at the beginning at least it was both recycling and organics management into the cost of of.

0:27:12.380 --> 0:27:18.150  
ANR - Catamount NL D215  
Trash disposal. It's. I'm sure everyone in here knows that got split off through the process.

0:27:20.580 --> 0:27:32.560  
ANR - Catamount NL D215  
Again, I think everybody sort of is aware that you know actual 148 passed both bodies of the legislature unanimously, right. And and getting to that, there was a really conscious decision and.

0:27:34.380 --> 0:27:46.210  
ANR - Catamount NL D215  
There are lots of parts of this law that were made vague in order to defer complex decisions down the road. Assuming that the agency would be able to work them out and that.

0:27:46.520 --> 0:27:57.690  
ANR - Catamount NL D215  
Ohh it would help a lot by Beth more broader political support for the bill itself as it moved through the body. There was a a genuine desire to get his broad support as as possible.

0:27:59.700 --> 0:28:4.830  
ANR - Catamount NL D215  
Yeah, with. So that's contextual information. I mean with respect to the hierarchy itself.

0:28:6.290 --> 0:28:41.180  
ANR - Catamount NL D215  
The hierarchy is a policy statement that is to direct agency and individual action towards trying to encourage people to manage their waste at the highest invest use, with the highest being human consumption, followed by animal consumption, followed by composting and digestion, and lastly in an energy recovery right and and this is the my recollection of this is that there was never an intent of legislature to have this apply sort of in a regulatory context to individual.

0:28:41.760 --> 0:28:44.120  
ANR - Catamount NL D215  
Or to individual entities and.

0:28:44.920 --> 0:28:55.700  
ANR - Catamount NL D215  
Because if you look at frankly the architecture of Act 148, it doesn't really support that sort of extension of the hierarchy too individual sort of application.

0:28:56.200 --> 0:29:26.990  
ANR - Catamount NL D215  
Uh, and I happy to talk about the challenges of of extending that in the sort of challenges on both transporters and ultimately in destination facilities. If you were to take the hierarchy and make it a regulatory requirement, because I think that again it it, it sort of a fundamental difference that from from a policy statement that drives sort of how we develop programs as opposed to an individual regulatory mandate that applies to.

0:29:27.90 --> 0:29:29.140  
ANR - Catamount NL D215  
To waste generators.

0:29:31.950 --> 0:29:47.240  
ANR - Catamount NL D215  
I mean, I to some degree I'm I'm gonna kinda stop there. I mean I think that, you know, Josh kind of went over the fact that you know, the agencies kind of taken that sort of policy concept and it's been sort of consistently applied for the past 11 or so years.

0:29:49.380 --> 0:29:50.850  
ANR - Catamount NL D215  
And I'll just stop.

0:29:51.490 --> 0:29:57.190  
ANR - Catamount NL D215  
Have a conversation. Answer questions. Delve into areas that people have an interest in and happy to just sort of.

0:29:58.50 --> 0:29:59.200  
ANR - Catamount NL D215  
Stop at this point.

0:30:1.310 --> 0:30:2.310  
ANR - Catamount NL D215  
Questions for Matt.

0:30:4.160 --> 0:30:21.870  
ANR - Catamount NL D215  
If anybody's on the online, like Billy Connolly, feel free to unmute yourself whenever you wanna, when you or reuse the raise hand function so we can recognize your put your camera on and wave and other folks saying deal. If you question raise your hand function for teams help a way for us to recognize it.

0:30:23.110 --> 0:30:23.380  
ANR - Catamount NL D215  
But.

0:30:22.590 --> 0:30:28.460  
Billy Connelly  
Yeah, we'll do. I'm not. I can't put my camera on, though. I've got COVID and it's there's decorum we have to follow.

0:30:31.90 --> 0:30:34.700  
ANR - Catamount NL D215  
Billy, sorry to hear that. Hope you hope you're feeling better soon.

0:30:35.840 --> 0:30:40.490  
ANR - Catamount NL D215  
Other, at least from the participants in this stakeholder group. Any questions or?

0:30:41.690 --> 0:30:43.80  
ANR - Catamount NL D215  
Matt, before we go to Peter.

0:30:44.560 --> 0:31:15.650  
ANR - Catamount NL D215  
Do we want to do math questions, then have Peter speak? Also have discussion time scheduled for later like this was intended to be, like a 5 minute kind of intro and the room kind of thing. Maybe we can hold it for discussion because we also got the questions that people submitted over the course of the week that pertain to this charge that we can dive into. Then they that be better time. Yeah, I think my my big thing just from my perspective is where we taking this industry forward and we can get stuck in the weeds like looking back and I I'm kind of more like yeah, it was vague on purpose how do we move it forward what are the things that we've learned from.

0:31:16.400 --> 0:31:46.150  
ANR - Catamount NL D215  
So I think Apple cider in that falls into a different regulation and we're having to look at those things that it's all those little things that we now know. But hey, how do we move this forward, not just try to hammer through, OK, it when we start getting you the legal things that for me it's like we're not gonna drive the industry forward. We're just gonna be sitting here at a. Everyone's gonna be in their camp whether you're the Decap Deepak camp, the organics camp or whatever it may be. So how do we kind of just.

0:31:46.500 --> 0:32:5.220  
ANR - Catamount NL D215  
Push down. Like what? Like you said it best, I think. What do we wanna see in 20 years from now and just knowing the recycling industries changed that much in 20 years, it's gonna happen with the organics industry as well and hopefully we can kind of be forward thinking but also practical to today to to let the system grow involved.

0:32:6.740 --> 0:32:10.0  
ANR - Catamount NL D215  
Well, nobody objects. Let's go to Peter. Peter Blair.

0:32:11.180 --> 0:32:13.790  
ANR - Catamount NL D215  
If you're ready, Peter, I think we're ready for you.

0:32:14.590 --> 0:32:16.450  
Peter Blair  
I am. Can you guys see and hear me?

0:32:17.230 --> 0:32:17.620  
ANR - Catamount NL D215  
Yes.

0:32:18.410 --> 0:32:20.770  
Peter Blair  
OK, wonderful. Uh, so just quickly.

0:32:19.950 --> 0:32:24.800  
ANR - Catamount NL D215  
Peter, Peter, can I ask how is our audio been? If he can, people hear us around the table.

0:32:28.650 --> 0:32:29.70  
ANR - Catamount NL D215  
OK.

0:32:25.610 --> 0:32:29.910  
Peter Blair  
It's it's actually been incredibly great, can hear everything crystal clear.

0:32:31.550 --> 0:32:31.880  
Peter Blair  
Yeah.

0:32:30.500 --> 0:32:36.390  
ANR - Catamount NL D215  
Yeah, that's the advantage of this room versus some of our other rooms. So did we nabbed it? Alright, go ahead, Peter. Sorry.

0:32:36.470 --> 0:32:36.870  
ANR - Catamount NL D215  
To get.

0:32:37.310 --> 0:32:47.870  
Peter Blair  
OK, no worries. So just quickly, my name is Peter Blair. I'm an attorney. I'm currently serving as the state policy director for just zero, which is a new environmental lab because the organization that focuses on waste management issues.

0:32:49.340 --> 0:33:18.90  
Peter Blair  
I'm gonna start by saying that I agree the goal of this stakeholder group should be to figure out what the policy should be moving forward. But to do that, I think it's really critical to understand what the law actually requires at this current moment. So my goal is to give an objective analysis of that, and I feel the best way to do that is to use the rules of statutory interpretation that the Vermont Supreme Court uses when handling differing interpretations of a statute. It's not very uncommon to have.

0:33:18.400 --> 0:33:24.140  
Peter Blair  
Kind of conflicting opinions on how a statute should be interpreted so the cords have actually developed rules.

0:33:24.760 --> 0:33:31.250  
Peter Blair  
For how they determine what the correct and definitive interpretation should be so that they can apply the law consistently.

0:33:31.950 --> 0:34:1.520  
Peter Blair  
So how do they do that? Well, the first step, the bedrock rule, is to determine what was the intent of the legislature. And you do this by two ways. First, just looking at the plain meaning of the law, the actual words on the page, and then considering them in light of the overarching legislative intent or purpose of the law. If the plain language meets the legislative intent, you're done. Everything's good. Clearly, the words they chose are effectuating the purpose that they had when passing the law.

0:34:2.60 --> 0:34:6.610  
Peter Blair  
However, if there's an instance where the plain language doesn't really meet the legislative intent.

0:34:7.340 --> 0:34:37.150  
Peter Blair  
Then the courts are going to give preference to the intent because the goal is to make sure that what was the overarching purpose of the law is actually being effectuated, not just the words. Chords are really reluctant to do that. They only do it if the precise language conflicts with the intent in a way where it is an absurd, unjust or unreasonable interpretation and then through all this, courts also look at the interpretations of similar statutes in other jurisdictions to see if that can shed light.

0:34:37.580 --> 0:35:2.290  
Peter Blair  
On the statute in question, so doing that for the organics management hierarchy, you start with the precise words and I think that's actually really easy. Here the relevant section we went through last time is 10 VSA, 6605 K and that defines who's being regulated, what they're being asked to do and how the hierarchy kind of fits into this regulatory system.

0:35:2.960 --> 0:35:5.210  
Peter Blair  
So when reading that section.

0:35:5.930 --> 0:35:35.920  
Peter Blair  
It's pretty clear that at the current time after July 1, 2020, any person who generates any amount of food residuals either needs to manage that on site or separate the residuals from all other solid waste and arrange for it to be transferred and managed to a location that can deal with it in a manner consistent with the hierarchy. So right there, words on the page alone, it appears that you are mandating that the hierarchy should apply to all generators.

0:35:36.440 --> 0:36:7.90  
Peter Blair  
However, we should look at other sections of the law and I think the other important section is the definition section specific. Specifically because the food definition food residuals also has important language that reinforces the role of the hierarchy. It specifically notes that food residuals are uncontaminated materials derived from processing or discarding food that is recyclable in a manner consistent with the hierarchy. So the decision seems to be to use plain words that.

0:36:7.170 --> 0:36:23.600  
Peter Blair  
The bed, the hierarchy into the system. So that's the first step. So next we need to look at the legislative intent and I didn't have the privilege of being part of that process. I think I was a freshman in college, so I was going off a lot of the legislative history materials online.

0:36:24.700 --> 0:36:51.870  
Peter Blair  
So the law was first introduced in 2011 and passed in 2012, and I think it's important to note that the first version of the bill, as it was introduced, didn't have the hierarchy. It's simply applied to generators of food waste that had two tons or more per year, or sorry per week, and made them divert materials from landfills. That was how it was introduced. However, is the build progressed in the legislature, it was amended.

0:36:52.850 --> 0:37:22.840  
Peter Blair  
House amended the bill to have the hierarchy to establish an SD policy at the state and also to embed it into the language applying to all generators the language that I read before, so that was approved by the Senate that was enacted into law and the Senate is the one that amended the legislation to have that definition of food residuals, the one that reaffirms and reincorporates the hierarchy into the definition. So from my point of view, those shouldn't be seen as kind of throw away things.

0:37:23.240 --> 0:37:55.90  
Peter Blair  
That those were legislatively intended actions, they were done not simply to create a system where we are keeping food waste out of the landfill, but we are trying to embed values into the system so that we give preference to the ways people are dealing with ergonomics to push them to using the higher social, economic and environmental management methods. So that was when it was passed. We also should look at what happened subsequently and the legislature has revisited the universal recycling law.

0:37:55.170 --> 0:38:28.220  
Peter Blair  
Two times. The first was 2018 and the second was 2019. 2018 is probably a little more important because it actually impacted the organic management portions of the law. So first they just change some rules for the haulers and made it clear that all solid waste haulers have to also accept food residuals. It's not really relevant to our analysis. The second change was to make some minor amendments to the language of section 6605 K the one that's really important for analysis, but that was really just making clear that after July 1, 2020.

0:38:28.420 --> 0:38:44.830  
Peter Blair  
All food residuals were going to be banned from the landfill, so the legislature didn't choose to change the hierarchy or how it applied to anyone. And I think that's an important fact because it shows that they didn't want to change how the system was working, what their original intention was.

0:38:46.370 --> 0:39:16.40  
Peter Blair  
For 2019, it didn't really impact the organics management provisions, but again, the bill was being considered if they wanted to change anything they could have so done the 1st 2 steps. So now I think it's important to look at other jurisdictions. And Ben touched upon this a little bit. I only saw six states with mandatory organics recycling. So Ben, you and I should talk about the ones I missed and I also found that none of them have organics management hierarchies in their law. In fact, most of them are completely indifferent.

0:39:16.400 --> 0:39:25.470  
Peter Blair  
About how you manage your organics, some statutes do place an emphasis on donation. New York's law requires that all designated food generators.

0:39:25.770 --> 0:39:36.960  
Peter Blair  
Uh, separate excess edible food and donate that for human consumption. All the remaining food waste. It's totally a free for all for how you want to deal with it, as long as it's not going to a landfill.

0:39:38.860 --> 0:39:58.560  
Peter Blair  
This, I think is important because with the exception of Connecticut, all of these laws were passed after Vermont's and for anyone familiar with the legislative process, you usually look to what's existing, to see what you want to do in your state. So these states made a conscious decision to not embed the values that Vermont did into the systems.

0:39:59.460 --> 0:40:6.830  
Peter Blair  
I would assume that they're most likely just trying to divert food waste from landfills and not create a priority of how things should be managed.

0:40:8.960 --> 0:40:38.190  
Peter Blair  
So then the other type of relevant law would be means food. I think it's called the food recovery hierarchy. It's really similar to Vermont's, and establishes that it's the policy of the state to divert food and food scraps from land disposal or incineration, and then sets a very similar priority abuses reduction at the source donation for hunger relief, utilization for energy recovery and as a soil amendment through composting, and then finally went disposal or incineration because.

0:40:38.250 --> 0:40:40.530  
Peter Blair  
May have some dog explicitly banned those things.

0:40:41.220 --> 0:40:45.590  
Peter Blair  
So pretty similar to what we're dealing with in Vermont, with one key difference.

0:40:46.400 --> 0:41:17.280  
Peter Blair  
In the main law, they explicitly note that the hierarchy is only used as a guiding principle that you're just using it to direct decision making related to solid waste and organics materials. So this law was passed after Vermont's. It's pretty telling that they chose to explicitly qualify it as a guiding principle, so that there couldn't be a type of interpretation that saw it as binding law. So going through that pretty objective statutory analysis.

0:41:17.650 --> 0:41:48.320  
Peter Blair  
My view is that it's pretty clear that the legislature was really intending to have the hierarchy be a pretty active, probably mandatory function of the system. That they weren't just trying to keep things out of the landfill, that the goal was to direct resources to the highest and best uses. So that's my opinion of what the law says. Now it's up to the stakeholder group to determine what the policy should be moving forward, but I would qualify that the only way to change a statute is to change the language of the Statute.

0:41:48.420 --> 0:41:58.170  
Peter Blair  
You can't simply interpret it in a different way, so I hope that was helpful and I spelled it out in a much more long and arduous way in the memo.

0:41:59.880 --> 0:42:7.650  
ANR - Catamount NL D215  
Thanks for that, Peter. We did print out copies. All the stakeholders have them and I also uploaded it to the FTP site that we're talking about earlier. So everyone has access. Thank you.

0:42:8.220 --> 0:42:8.940  
Peter Blair  
Alright, thank you.

0:42:11.310 --> 0:42:13.870  
ANR - Catamount NL D215  
Peter, thanks much that was enlightening.

0:42:14.790 --> 0:42:16.420  
ANR - Catamount NL D215  
Well, the questions for.

0:42:17.90 --> 0:42:30.60  
ANR - Catamount NL D215  
For Peter, like I did last time, back for questions, right? Yeah. Or we can have the general discussion I there was a desire to do around. Have you all talk about your experience with it, but maybe since you're gonna get into discussion.

0:42:31.660 --> 0:42:37.370  
ANR - Catamount NL D215  
Where we go from here? Questions. Yeah, maybe that be. Do not. And Peter questions now and then go to you guys after.

0:42:40.990 --> 0:43:6.400  
ANR - Catamount NL D215  
Then you mentioned there were preestablished questions that were submitted. Yeah, I've seen those. But give can we focus on the those that come from the committee member or we take on all this list is all committee members OK? We didn't we didn't. I mean, I sort of submitted questions, but I didn't really submit them that way. OK. Well, we can do however we want. If you got questions top of mind, we can just fire them off now and then. Look at time. I can go down the list as time allows. Sure.

0:43:7.580 --> 0:43:7.890  
ANR - Catamount NL D215  
Work.

0:43:10.560 --> 0:43:13.20  
ANR - Catamount NL D215  
I guess one one question I have, Matt is.

0:43:14.220 --> 0:43:14.660  
ANR - Catamount NL D215  
Umm.

0:43:15.640 --> 0:43:17.980  
ANR - Catamount NL D215  
When in you, you've.

0:43:19.290 --> 0:43:34.770  
ANR - Catamount NL D215  
Been in a lot of policies, done development processes and you know, legislative policy and law far better than I do. And I'm just curious, you know, when there are phrases like policy of the state.

0:43:35.480 --> 0:43:54.160  
ANR - Catamount NL D215  
Umm, how are those typically interpreted? I mean, that's a that that's a specific use of the term policy it it is and I think you know the historic interpretation that both the agency and the Supreme Court has taken when something gets framed as a policy is that.

0:43:56.180 --> 0:44:8.720  
ANR - Catamount NL D215  
That it more is is think of it as sort of a a guidance or overlay to agency action directing them in a particular way as opposed to an individual directive or mandate. Now having said that.

0:44:9.800 --> 0:44:37.500  
ANR - Catamount NL D215  
You will find other cases that go the exact opposite direction. The court is all, and I think that's one of the challenges. I mean, like, I don't disagree with Peters framework at all. I think that reasonable people can reach a different opinion to the framework that Peter went through. And I think Michael Grady basically said it in testimony last year that he thought that the statute was ambiguous and that there were multiple reasonable interpretations of it. And, you know, I think it.

0:44:38.200 --> 0:44:53.950  
ANR - Catamount NL D215  
Everyone benefits from the policy guidance and clarity around what this group thinks the the best outcome is with respect to implementation of the hierarchy. Should it be something frankly, that that.

0:44:54.610 --> 0:45:25.720  
ANR - Catamount NL D215  
You are telling us as agency officials, that we need to do a better job of strengthening human food diversion and agricultural food diversion in the the sort of general, you know, world right, you know, as as a part of the waste management system or or I frankly would be looking to you guys to give me thoughts and direction on how you would draw down the hierarchy to individual people because.

0:45:25.840 --> 0:45:45.790  
ANR - Catamount NL D215  
My mind immediately goes to something like a manifest. This to where there's paperwork tracking waste shipments that that are stored like at facilities that we would come in and inspect, which it don't. My my immediate reaction is a regulator is something that would probably be negative to the system as a whole.

0:45:48.30 --> 0:46:1.920  
ANR - Catamount NL D215  
And and when when a when a piece of legislation has the use of the word, you know or the phrase policy of the state. Yeah. And then it's paired with a a phrase like shell be managed. Yep. According to and then a reference.

0:46:2.580 --> 0:46:24.370  
ANR - Catamount NL D215  
Umm, how does that secondary reflection in the use of the word shell typically get? Isn't Shell a pretty strong legal word? It's not ambiguous, is it? Well, it's it's directive. It's supposed to permissive, right? Like so would be more of a mandate. No. Yeah, I was sorry to say it's directive. And that, generally speaking, shall is directive and not permissive. Right. So.

0:46:25.500 --> 0:46:28.330  
ANR - Catamount NL D215  
You know, again, I think that that.

0:46:29.890 --> 0:46:38.600  
ANR - Catamount NL D215  
Going back to the hierarchy and sort of how the hierarchy is imbedded, I think that there's.

0:46:39.970 --> 0:47:2.370  
ANR - Catamount NL D215  
There's a lot of of sort of direct contextual legislative history around the incorporation of the hierarchy, and a lot of the things that we're talking about today happened, at least on the side of the conversations that took place when Act 148 was was out there. And I I don't think that there was sort of clarity of opinion as to what the hierarchy would mean or how it would be interpreted.

0:47:3.750 --> 0:47:4.280  
ANR - Catamount NL D215  
I mean.

0:47:5.80 --> 0:47:10.170  
ANR - Catamount NL D215  
So I again I I think it's probably useful to have a conversation about like.

0:47:10.840 --> 0:47:13.50  
ANR - Catamount NL D215  
Yeah, but I will also say.

0:47:14.80 --> 0:47:23.400  
ANR - Catamount NL D215  
Two days I used to be an attorney. I'm not anymore. So I'm not gonna strive, like, sit here and pick apart statutory analysis or construction. Right? Like both.

0:47:24.50 --> 0:47:33.500  
ANR - Catamount NL D215  
Not my job anymore and I'm happy to have someone from legal counsel come in and do it. But but also, I mean I. I mean, I think there's value to.

0:47:34.770 --> 0:48:7.850  
ANR - Catamount NL D215  
To just sort of stepping back and talking about what it is we want to accomplish, yeah, I I think so too. Although I again, I think we're trying to as a group kind of develop a body of evidence. Yeah, in order to do that. So I think it's, I think for the sake of folks that haven't been in on these conversations and we have all, many of us have had the opportunity to do this work proactively in the past and that opportunity wasn't seized or reciprocated. So that's why we find ourselves here today. So we're still actually trying to clarify what those goals might be.

0:48:8.580 --> 0:48:21.700  
ANR - Catamount NL D215  
Done. I I have a specifically one of the things that's been cited by Anne R as to why the hierarchy is not a mandate is the unenforceability of item one on the hierarchy being sourcer deduction.

0:48:23.290 --> 0:48:26.60  
ANR - Catamount NL D215  
That was Kathy Jamison's refrain consistently.

0:48:26.140 --> 0:48:28.190  
ANR - Catamount NL D215  
Yeah, and.

0:48:29.430 --> 0:48:41.370  
ANR - Catamount NL D215  
In that sort of basic argument to me is the premise that it was intended to be enforceable, but that there is a component of it that is unenforceable, and therefore the entirety of it is unenforceable.

0:48:42.300 --> 0:48:52.50  
ANR - Catamount NL D215  
And I'm just curious, you know, I I deal more with like private contracts where there are issues of severed severability.

0:48:52.310 --> 0:48:55.600  
ANR - Catamount NL D215  
Yeah. And typically in a in a contract.

0:48:55.840 --> 0:49:3.130  
ANR - Catamount NL D215  
And we're very clear that if one part of this contract is not legally viable.

0:49:3.870 --> 0:49:7.560  
ANR - Catamount NL D215  
It does not make the entire contract null and void.

0:49:8.720 --> 0:49:16.650  
ANR - Catamount NL D215  
Umm. And so if if A&R understood the intent of the legislature but felt one part of it.

0:49:16.860 --> 0:49:21.100  
ANR - Catamount NL D215  
Uh, it's mandate was not enforceable.

0:49:23.70 --> 0:49:26.460  
ANR - Catamount NL D215  
Does that? Is that what makes the entire hierarchy unenforceable?

0:49:29.80 --> 0:49:34.940  
ANR - Catamount NL D215  
And if so, if the hierarchy is not enforceable, is the law itself enforceable? If we're not willing to sever these things?

0:49:35.700 --> 0:49:45.790  
ANR - Catamount NL D215  
So first of all, general principles of separability apply to statutory construction too, and it's a part of the general construction elements of the statute. So.

0:49:46.720 --> 0:49:53.790  
ANR - Catamount NL D215  
You know 11 portion of of a statue being invalid, at least in the you know, when we're dealing with.

0:49:55.590 --> 0:50:12.60  
ANR - Catamount NL D215  
When we're dealing like with a legal challenge to a statute, one portion doesn't mean that that it, the whole statute valid, right? So I mean, again, there's the legal interpretation. And then there's there's historic program policy interpretations. So.

0:50:12.700 --> 0:50:13.340  
ANR - Catamount NL D215  
Ohm.

0:50:14.130 --> 0:50:27.560  
ANR - Catamount NL D215  
Again, I think that the historic interpretation of the hierarchy, and specifically subsection a of the hierarchy is that was a policy statement and not sort of driven down into as an enforceable legal standard.

0:50:28.180 --> 0:50:58.130  
ANR - Catamount NL D215  
Umm and I can add on to that. I mean, Tom, when I worked with Kathy and asked her, like, what was her read on this? I don't remember ever her saying. Well, we can't force number one. So the whole thing is unenforceable. It was always no, it's a policy of the state. So it's sort of a recommendation. It's guidance and that was always the way she couched it from that perspective. Yeah. She came out in meetings. Was well, you know, dialogue and frustration and difficulty of thinking about how you implement it.

0:50:58.440 --> 0:51:10.560  
ANR - Catamount NL D215  
The first one is one of the most difficult implement, but the the rest are actually quite difficult as well. If you really want to get into details and I think we should because like or the group should, because I think that is your charge so.

0:51:11.960 --> 0:51:13.340  
ANR - Catamount NL D215  
That's my memory of.

0:51:14.600 --> 0:51:19.550  
ANR - Catamount NL D215  
What? What me and I heard from Kathy is people would go out and talk about the laws. It was guys.

0:51:22.50 --> 0:51:33.610  
ANR - Catamount NL D215  
And and what? Well, my my last question done, so I don't take up too much time here. What would the agency need the policy to read as in order to make it enforceable?

0:51:34.900 --> 0:51:52.620  
ANR - Catamount NL D215  
What would be? What would be the language changes that I I think that you would recommend that would be striking the first clause. It is a policy of the state that and just say food residuals collected under this chapter shall be managed right? So remove the back of it being a policy statement and making it.

0:51:53.430 --> 0:51:55.530  
ANR - Catamount NL D215  
A A directive statement.

0:51:58.520 --> 0:52:5.50  
ANR - Catamount NL D215  
Just wanted to add on one thing I discovered when doing some of this research and other states, which was extremely painful by the way, thank you for making me.

0:52:7.450 --> 0:52:34.900  
ANR - Catamount NL D215  
It's not. It's not directly related to food waste, but I found something from Minnesota Legislature back in 22,002. It's related to their solid waste hierarchy. I'm just gonna quote this real quick. It says when this hierarchy was first enacted, policymakers believe that the government had the authority to direct ways to be managed and specific ways, and even that specific facilities to ensure that it was managed at the appropriate level of the hierarchy. However, judicial decisions in recent years have constrained government's ability to do so.

0:52:35.320 --> 0:53:6.320  
ANR - Catamount NL D215  
Policymakers have responded by implementing tools other than their regulatory flow control authorities, such as contracts with haulers and other financial incentives to guide ways to be managed accordance with the state policy. That's just a little snippet that, I mean it. Other states are struggling with this too in different context. Yeah. So maybe the bullet point from this discussion is it's unclear if if this is requirement or policy to guide in or is a decision making. Maybe that's a blocker for the report, that it's vague whether or not this is a requirement or not.

0:53:6.690 --> 0:53:20.220  
ANR - Catamount NL D215  
We can share that up, so let's clarify this. The legislative question we're answering then, because I I read the if you could reread it then if you have it right there, I I read it to say should it apply to everyone, which implies to me that it is.

0:53:21.0 --> 0:53:23.790  
ANR - Catamount NL D215  
A mandate in the question is who does the mandate apply to?

0:53:24.680 --> 0:53:46.730  
ANR - Catamount NL D215  
So recommendations on whether the organics management hierarchy and 10 VSA 6605 K should apply to each generator of organic waste? Right. So I I I I guess I'm a little confused, maybe we could quickly clarify that as a group because to me that doesn't say should the hierarchy apply it says should the hierarchy assumption that it exists apply to every generator?

0:53:48.80 --> 0:54:11.590  
ANR - Catamount NL D215  
I think there could be a number of different questions in there and then I I think it's also important to know that it's that first word recommendations. It's looking for what comes out of this room and going for it. It's it. I don't read from that that there's just one or two particular questions that this group is tasked with answering but more.

0:54:12.370 --> 0:54:13.710  
ANR - Catamount NL D215  
Offering some guidance.

0:54:14.520 --> 0:54:16.880  
ANR - Catamount NL D215  
Going forward, because I think you could look at.

0:54:17.650 --> 0:54:19.300  
ANR - Catamount NL D215  
To apply, you know.

0:54:19.990 --> 0:54:31.740  
ANR - Catamount NL D215  
That unto itself, should the hierarchy apply? Each generator to me like that's a huge question, knowing that generator is not defined. You could really drill down to like.

0:54:32.930 --> 0:54:44.80  
ANR - Catamount NL D215  
Is this enforceable by household per se, which is? I think it's part of the question. Yeah. Yeah. And I think that could bring its own unique set of challenges. So I don't know that there's one.

0:54:44.690 --> 0:54:58.840  
ANR - Catamount NL D215  
Definite question I I think we should focus on. I think if we can put out some guidance, you know, what does it look like in 20 years? And then as Peter said policy going forward. So I think that's where I would come.

0:54:59.580 --> 0:55:0.360  
ANR - Catamount NL D215  
Reading that.

0:55:2.390 --> 0:55:6.500  
ANR - Catamount NL D215  
I do also want to point out I think we had 55 minutes.

0:55:7.220 --> 0:55:14.980  
ANR - Catamount NL D215  
And kind of the front end of this agenda. So we're starting to work into our time. We're starting to working with the discussion, which is fine, yeah.

0:55:16.300 --> 0:55:21.160  
ANR - Catamount NL D215  
I don't know if there's questions for Peter or I. I guess I'm confused as well about the.

0:55:21.920 --> 0:55:35.230  
ANR - Catamount NL D215  
That task, because it my read of it, is that it's more of a question of enforcement. I think what I'm hearing is there was, depending on you know, the interpretation by an R is that this hierarchy does exist. It's a very real thing.

0:55:36.130 --> 0:55:52.290  
ANR - Catamount NL D215  
It's just not enforceable and and never was intended to be, whereas we've heard that maybe the legislature did intend that. So there's, I understand that disagreement, but now I think I'm hearing I think I'm an agreement with Tom's question about this because.

0:55:53.630 --> 0:56:1.260  
ANR - Catamount NL D215  
It sounds to me like there's no question that it exists it it's in, it's written, we've got the picture. We know it looks like we know what the different steps are.

0:56:2.710 --> 0:56:9.250  
ANR - Catamount NL D215  
And so I'm wondering if rather than should apply to each generator, because it I think it already does apply to each generator I think.

0:56:10.250 --> 0:56:16.320  
ANR - Catamount NL D215  
If if apply does not mean enforcement and so Mike, I think my read on is should it be enforced?

0:56:17.30 --> 0:56:18.0  
ANR - Catamount NL D215  
For each generator.

0:56:18.550 --> 0:56:33.990  
ANR - Catamount NL D215  
Umm, I don't know if that if that jives with the other people are understanding those words to me, but I think it's a a valid question that we are supposed to answer and I and I get the you know looking forward, not looking back and and appreciate that this is a big opportunity to.

0:56:34.860 --> 0:56:36.710  
ANR - Catamount NL D215  
Keep it how we want it to be, but.

0:56:37.540 --> 0:56:40.590  
ANR - Catamount NL D215  
I don't know. I don't know what that question means, if not that.

0:56:44.260 --> 0:56:57.570  
ANR - Catamount NL D215  
Dame, but I think the the approach we've taken from the solid waste program is voluntary compliance, right? I mean, so we're not remember Josh's tagline at the meetings is we're not gonna be pulling open bags to look for the banana peels, the banana peel police.

0:56:58.530 --> 0:57:3.880  
ANR - Catamount NL D215  
So that's that's sort of the approach we've taken then I wasn't I was in then all those meetings but that was.

0:57:4.880 --> 0:57:21.50  
ANR - Catamount NL D215  
The voluntary compliance is probably the best way to sum it up, so I guess you were talking about are we gonna like your question about are we gonna enforce it or not? Maybe that's the pressure point or maybe that's the question. Well, I think there's always acknowledgment that things.

0:57:22.410 --> 0:57:36.340  
ANR - Catamount NL D215  
In law, don't always get enforced away that everybody would like them to be enforced, probably. And so even in my mind, if it were deemed that that this is officially enforced or or or policy that should be followed then.

0:57:38.670 --> 0:57:40.780  
ANR - Catamount NL D215  
I don't know. I I'm I'm worried. I'm. I'm.

0:57:41.560 --> 0:57:47.910  
ANR - Catamount NL D215  
Sure, I'm confused by the the difference of those words, enforcement versus application.

0:57:49.170 --> 0:57:50.170  
ANR - Catamount NL D215  
Of the hierarchy.

0:57:51.710 --> 0:57:56.120  
ANR - Catamount NL D215  
Understanding that enforcement doesn't always mean that it actually gets enforced, but.

0:57:57.540 --> 0:58:27.800  
ANR - Catamount NL D215  
And there's, yeah, I I will. I'll just jump in and say I am mindful time is Steve Cash said I will say that in in addition to the good commentary Tom and Matt were having, you know if you strike it's the policy of the state, there's a lot of reference to a person shall person who produces like I would actually like to say a person shall do this if you're going to say this is how it should be read, cause the other stuff in statute does say that it says.

0:58:28.90 --> 0:58:35.520  
ANR - Catamount NL D215  
Facility that manages waste. Trash will do this of polar that manages this shall do that. A person that produces more than this shall do this.

0:58:37.260 --> 0:58:47.210  
ANR - Catamount NL D215  
Well, I guess just sort of build off of that. You know where where if if this is a regulatory requirement that it's going to be enforced.

0:58:48.190 --> 0:58:58.90  
ANR - Catamount NL D215  
How how are we going to actually make it enforceable? Right. And and and I think to me and to whom does the obligation to basically?

0:58:59.0 --> 0:59:7.80  
ANR - Catamount NL D215  
You know, maintain bradfords and and ensure sort of compliance because for some degree, you know again they're sort of stepping back. If you were to make this.

0:59:8.330 --> 0:59:38.830  
ANR - Catamount NL D215  
One way that one could make this individually enforceable, and there may be others right is to basically follow a model where there's basically a a manifest or bill of Laden that follows materials along through the process that basically I as a generator have to certify that I've reached out to John sales at the Food bank. And he said no, this material is ineligible for coming to the food bank that gets documented in the date that the conversation took place. They reach out to Tom and say, Tom, can you take this material at your?

0:59:38.910 --> 1:0:8.590  
ANR - Catamount NL D215  
Your agricultural facility and you say no or yes. It's eligible and then I can finally go to Dan and say, OK, I've got, you know, 2 tons of material that I wanna bring out to compost at the the facility and that that document would basically live it, the compost facility documenting the other two attempts. I'm not, I'm pretty sure that's not what the legislature intended in doing this, right. I mean, I think that that you wouldn't have seen the unanimity of purpose.

1:0:9.670 --> 1:0:40.280  
ANR - Catamount NL D215  
In the legislature, if the intent was to have that sort of of manifesting system, follow the organics waste management along the process, I think it it would be hard for me as a Regulatory agency to think about how we could even handedly enforce something in the absence of a paper trail that follows each generated load. Right, because then it starts becoming more frustrated with generator acts. So we're going to selectively enforce against generator acts.

1:0:40.380 --> 1:0:44.450  
ANR - Catamount NL D215  
Right. And go in and make them document things so.

1:0:45.100 --> 1:0:49.520  
ANR - Catamount NL D215  
I think that's the challenge with turning the hierarchy into a.

1:0:50.520 --> 1:0:52.660  
ANR - Catamount NL D215  
Sort of regulatorily enforceable.

1:0:54.700 --> 1:1:12.530  
ANR - Catamount NL D215  
Structure that that sort of is enforceable against generators and and frankly ultimately against destination facilities, right? Because if you accept it, you violated the the hierarchy as well. So so stepping aside from the existing legislation, sure and looking forward, yeah.

1:1:14.160 --> 1:1:18.330  
ANR - Catamount NL D215  
I think this is important and I I don't think your concern is.

1:1:19.720 --> 1:1:21.40  
ANR - Catamount NL D215  
Missed misplaced.

1:1:23.420 --> 1:1:37.880  
ANR - Catamount NL D215  
If, if, if we all agreed so last time we did a little exercise is a group and we said in 20 years what we really proud of the organics management system looking like and and highest and best use came up and I think we're all interested in seeing resources to their highest and best use.

1:1:38.820 --> 1:1:44.390  
ANR - Catamount NL D215  
And so, without creating this ridiculous bureaucratic and enforcement burden, how would a society?

1:1:46.290 --> 1:1:46.810  
ANR - Catamount NL D215  
Done.

1:1:48.90 --> 1:1:49.500  
ANR - Catamount NL D215  
I would have society.

1:1:50.340 --> 1:2:5.990  
ANR - Catamount NL D215  
Meaningfully and not just relying on voluntary participation that we know historically doesn't pan out, how would a society prioritize ensuring that those materials do go to their highest and best use without creating this really cumbersome system?

1:2:9.240 --> 1:2:18.180  
ANR - Catamount NL D215  
One thing we've done is is outreach and we we did I the one I think I failed to talk about was source reduction at the beginning when I talked about the rollout, the law we started with.

1:2:18.870 --> 1:2:40.260  
ANR - Catamount NL D215  
Umm. And let me let me back up a little bit from from everybody's human experience, you create organic waste because you eat food and in that process there's food that was edible and there's food that was inedible. And knowing that and and in our in, in my experience and in the teams experience working with businesses for first initially.

1:2:41.430 --> 1:3:3.990  
ANR - Catamount NL D215  
Required to do something with the law. A lot of their wasted food is on, sometimes unpreventable. They are a coffee shop and make coffee grounds right? So so to meet that moment we really started with the diversion options. Lower end of the hierarchy in terms of trying to tell people what the resources and available systems were to manage stuff. So we kind of.

1:3:5.220 --> 1:3:9.710  
ANR - Catamount NL D215  
Didn't spend, didn't have as much time invested in source reduction, so in.

1:3:10.680 --> 1:3:17.170  
ANR - Catamount NL D215  
It was 2019. We did a media multimedia campaign on source reduction and really focused there. We've done.

1:3:18.190 --> 1:3:21.850  
ANR - Catamount NL D215  
Three food waste campaigns so far. Clean compost is just about to come out.

1:3:22.150 --> 1:3:26.220  
ANR - Catamount NL D215  
Ohm, not four. I might have that wrong. This might be our 4th.

1:3:27.480 --> 1:3:52.230  
ANR - Catamount NL D215  
But but a one on source reduction was specifically built in with a tips and a web page and all that stuff from everyone, from the homeowner to generators. But I don't I I just want to be clear. I guess average is great, but I think there's not a single. Hopefully there's not a single person in this room that believes that that historically has proved out to be enough to really guide guide markets because markets have their own way of thinking that are not purely logical.

1:3:53.500 --> 1:4:4.10  
ANR - Catamount NL D215  
And so if we wanted to ensure I wanna use that word, that edible food, for instance, was going to food insecure families who are not at market because they don't have buying power.

1:4:4.910 --> 1:4:8.440  
ANR - Catamount NL D215  
You need to somehow figure out how to override that market with intent.

1:4:9.600 --> 1:4:12.90  
ANR - Catamount NL D215  
What would be the mechanism so that we could?

1:4:12.780 --> 1:4:22.800  
ANR - Catamount NL D215  
At least get a 90% success rate. You know, I don't. I think that that bureaucracy insists on the 100%. I think if we did 90 percent, 85%, wow, we'd be knocking it right out of the park.

1:4:24.280 --> 1:4:54.70  
ANR - Catamount NL D215  
I will just say I don't. I don't have a like I've thought about this time and I'm like, I don't have like a great answer or response back, right? Like trying to think because I agree with, I generally speak, I agree with you objective, right? Like I mean if you were to tell me there was a magic knob that we can turn that would help sort of promote the hierarchy. I think that's a policy objective that the agency shares. I think the challenge is how do we use the, what are the tools out there to basically help us reach the policy objective that's.

1:4:54.190 --> 1:5:1.250  
ANR - Catamount NL D215  
That's in here and I'll just say just before I, before I stop the one thing that I thought about and I think the one thing that.

1:5:2.120 --> 1:5:19.290  
ANR - Catamount NL D215  
That we have been as an agency very focused on sort of the the organics management part of the stream in the the sort of compost and digestion sort of like that sort of trunk tranche of things and maybe we need to be looking up and how can we use.

1:5:19.930 --> 1:5:28.730  
ANR - Catamount NL D215  
Funding, you know, education and outreach and and sort of the the sort of soft tools funding tools of the state to promote.

1:5:29.600 --> 1:5:54.130  
ANR - Catamount NL D215  
You know tag use of of food, nag, use of food for human human consumption as as solid, you know using solid waste management money to promote additional opportunities and access points for those types of materials. So that's that's a one constructive suggestion in that I had. But I agree I mean like it's it's difficult to think about how you would you would take.

1:5:54.880 --> 1:6:26.290  
ANR - Catamount NL D215  
This policy group, there's this like policy statement and then turn it into something that you drive through our existing set of tools. I wonder if this is something that we could ask for from the Agency for of it as part of our, I think that this process is hopefully that knob right, we're hopefully by the report we've like Mike was saying, we've kind of vision this thing forward and and we've tried to sort of produce some of these things. So I wonder if the if that's something that the agency could generate.

1:6:26.360 --> 1:6:36.500  
ANR - Catamount NL D215  
For us, which is sort of, you know, trying to understand the the friction between the sort of the policy side and the bureaucracy of it and the intent, what are some options?

1:6:37.760 --> 1:6:59.240  
ANR - Catamount NL D215  
And I and I would want to be really clear that what we need to figure out how to cut through is that there are potentially technologies or approaches that while you do great outreach and make great arguments for why food rescue would be important, would override that and and negate that. And how do we navigate those with clear intent in the legislation.

1:7:0.820 --> 1:7:30.690  
ANR - Catamount NL D215  
And if if maybe the the agency could put legal some legal counsel and other folks on that or or somebody else that can track some concepts that I was worried, I certainly think we are more than happy to devote some resources to brainstorming around what. But I also think it would be great with everyone here from your various perspectives. I mean, frankly, you have more real life experience in this field. I mean, we certainly have a knowledge of regulatory tools and I'm certainly willing.

1:7:31.200 --> 1:7:45.170  
ANR - Catamount NL D215  
To look at what other states have done and think about what other creative options there are, males speak for myself. I helped draft the hierarchy. No, I remember I was going to say I thought you did with us. They drafted this. I thought you did. I feel like I threw my.

1:7:45.250 --> 1:7:49.810  
ANR - Catamount NL D215  
The you know my idea in here. Yeah. Yeah. And now here we are, eight years later.

1:7:50.740 --> 1:7:59.580  
ANR - Catamount NL D215  
Revisiting its validity and and I do think it's possible to set an aspiration as a society that we don't try to hit 100% on and make everybody feel out.

1:8:0.550 --> 1:8:5.270  
ANR - Catamount NL D215  
Paperwork along the way, but that you can say yes, we did contact and know the food bank won't come here.

1:8:6.770 --> 1:8:23.90  
ANR - Catamount NL D215  
Anyway, I don't wanna get stuck. Yeah, if you want to finish up. No, no. I guess I have two thoughts. One, I I really would like to hear from folks in this room who do this work on a regular basis and some ideas and thoughts about this conversation, but.

1:8:24.650 --> 1:8:55.250  
ANR - Catamount NL D215  
One thing kind of on your question, Tom, I looking at this hierarchy and then from our last meeting I heard on a number of occasions that flexibility is needed for managing waste. I think, Mike, you said it with the emergency situation. Then Tom, I think you referenced like Oh well, if you have spoiled food, you would know you come in at the hierarchy at this level. So what that says to me is you there needs to be some flexibility. So one thought I would have and this is by no means an answer to your question, but it's just.

1:8:55.490 --> 1:8:57.830  
ANR - Catamount NL D215  
Kind of a potential area to start, I think is just.

1:8:59.20 --> 1:9:10.380  
ANR - Catamount NL D215  
Having some flexibility so people can make those timely decisions because it sounds like they need to be fast decisions of like we have this waste doesn't go to a does it go to B?

1:9:11.450 --> 1:9:20.100  
ANR - Catamount NL D215  
The more structure that exists, there's going to be more steps to navigate and I think we all should just have that awareness of if these need to be quick decisions.

1:9:21.160 --> 1:9:52.290  
ANR - Catamount NL D215  
Some of that structure makes that more challenging, so, but I can I can I wanna acknowledge that Peter has raised his hand to Peter. Hang on just a second, if you would. I wanna go to Steve's request to go around because that's on the agenda too. I will just say as an example on that point, I did discuss what we've done as an agency, but I didn't. One of the things I didn't hit on was some work we've done with Mike, with Kent actually not so much you Mike, but with Kim. Sorry, I don't know nothing there. It was it was Trevor Mance and Karen Flanders were bringing up.

1:9:52.510 --> 1:10:22.840  
ANR - Catamount NL D215  
Waste that. What? What was it? Banned food waste, right. That was a question. And then there's all the. Then the scroll hits the floor with how many different scenarios can you run through? Mike mentioned a freezer that went down. That's a scenario. And where does the minimis clause apply? And how does the agency roll that out? How did that symptoms point? I don't think that that's not happening entirely. I think generators are generators out there that are doing that. We don't have a gauge on what percentage of that is so. Absolutely. Yeah. We have the solid waste.

1:10:22.950 --> 1:10:34.140  
ANR - Catamount NL D215  
Commentation plan, process and the districts would probably kill me for saying this, but there is a there is possibly a tool or a mechanism to kind of gauge that percentage through that process.

1:10:34.990 --> 1:10:54.940  
ANR - Catamount NL D215  
And there is an outreach report at the end of the year. There are three used to have surveys, but they were supposed to. We were supposed to do. They're upstairs. They can hear you. No. Yeah, but there is some possibilities for a knob that through that process. Yes. Yep. And I just wanted, and I'll stop talking so we can go to others. I just wanted to point out that.

1:10:55.770 --> 1:11:25.460  
ANR - Catamount NL D215  
Through the dialogue with some, Casella challenged waste and Trevor Mann, so used to be the zone hauling company, then working for Casella, we created a sheet that basically describes when something could meet the definition of food waste and when it, because it has to be a food waste if it's manageable according to the hierarchy in the definition. Peter read some of the earlier and so if it is uncontaminated and it's a food way. So there was cases where I think we had one with.

1:11:26.130 --> 1:11:32.0  
ANR - Catamount NL D215  
The chemical in the food waste that was of pH made it hazardous. Yeah, that was added vinegar.

1:11:33.30 --> 1:11:47.340  
ANR - Catamount NL D215  
Or I dealt with the one where a whole warehouse the the fire system went off and it had fire retardant. All of it, right. Yeah. So, so. So we tried to create a structure, and if that is helpful to look at that.

1:11:47.980 --> 1:11:54.270  
ANR - Catamount NL D215  
I just want to make sure that that's out there. We can post it's on our website. We can also post it to the website. So I'll stop talking would be good. Yeah, I know.

1:11:55.240 --> 1:11:58.320  
ANR - Catamount NL D215  
You around maybe, Steve, you asked a good question. You answer to me.

1:11:59.400 --> 1:12:2.340  
ANR - Catamount NL D215  
We'll come back to Peter. Yeah, I'm happy to go and.

1:12:3.580 --> 1:12:10.990  
ANR - Catamount NL D215  
Give my experience on the hierarchy and and and what I think would be ideal for my perspective so.

1:12:12.130 --> 1:12:16.510  
ANR - Catamount NL D215  
So I've been composting through SWD and interval compost prior to that for.

1:12:17.470 --> 1:12:19.390  
ANR - Catamount NL D215  
19 some odd years and.

1:12:20.350 --> 1:12:33.550  
ANR - Catamount NL D215  
I think generally we're that we've been the biggest food waste composter in the state for that whole time, and so we've received a lot of this food over the years that has gone into soil and been used in gardens and lawns and farms.

1:12:34.400 --> 1:12:42.130  
ANR - Catamount NL D215  
Uh does important things. As we all know, accomplish is good. I don't think anybody would disagree with that. There's good compost, bad compost, perhaps, but anyway.

1:12:44.530 --> 1:12:46.140  
ANR - Catamount NL D215  
And I think Vermonters.

1:12:47.900 --> 1:13:1.590  
ANR - Catamount NL D215  
Also, recognize that compost is a is a good thing to do in the in the I think take pride in the in the systems that we have in Vermont for composting, which as we historically have done much, much better than other states for many many years.

1:13:2.470 --> 1:13:3.50  
ANR - Catamount NL D215  
So.

1:13:4.300 --> 1:13:4.840  
ANR - Catamount NL D215  
Ohm.

1:13:5.940 --> 1:13:12.690  
ANR - Catamount NL D215  
I think our challenge now is we're this new technology packaging is kind of why we're all here.

1:13:14.470 --> 1:13:25.880  
ANR - Catamount NL D215  
Arrives on the scene is and and serves a really important function I I would argue in the food waste diversion if if our end goal is to decrease the amount of food going into the landfill.

1:13:26.560 --> 1:13:27.710  
ANR - Catamount NL D215  
Something like Deepak.

1:13:28.570 --> 1:13:31.230  
ANR - Catamount NL D215  
Technology is is a great thing to add to the mix.

1:13:31.930 --> 1:13:39.140  
ANR - Catamount NL D215  
The challenge, in my view is, is how the hierarchy lack of hierarchy, lack of enforceability or whatever.

1:13:40.520 --> 1:13:41.100  
ANR - Catamount NL D215  
By.

1:13:41.900 --> 1:13:49.130  
ANR - Catamount NL D215  
By letting uh the markets decide, I think there is danger of things going to the bottom of the hierarchy every time.

1:13:50.430 --> 1:14:2.940  
ANR - Catamount NL D215  
Because of scale, because of pricing, because of market control and and I think some of the higher options are inherently gonna be endangered.

1:14:4.290 --> 1:14:11.580  
ANR - Catamount NL D215  
As a result, if there if there are not further guidelines on how to implement and how to interpret the the hierarchy so.

1:14:13.310 --> 1:14:26.820  
ANR - Catamount NL D215  
In our scenario, for instance, we we actually looked at installing ad packager at our facility a few years ago, we were, Mike was looking at it and Williston we were looking at it, Wilson at the same time Casilla got to it first.

1:14:27.520 --> 1:14:29.470  
ANR - Catamount NL D215  
Ohm and.

1:14:31.850 --> 1:14:34.10  
ANR - Catamount NL D215  
A lot of the food that we used to.

1:14:35.100 --> 1:14:44.520  
ANR - Catamount NL D215  
Turn into compost for all those important uses. Now goes to deep packaging and goes to the anaerobic digesters eventually and applied.

1:14:45.340 --> 1:14:45.850  
ANR - Catamount NL D215  
Ohm.

1:14:46.630 --> 1:14:57.620  
ANR - Catamount NL D215  
And I don't have any problem with Deepak technology. I think it's state, it's really important. But I I think there it would be important if we had some guidance as to what should go into deep packagers.

1:14:59.440 --> 1:15:1.460  
ANR - Catamount NL D215  
They are designed for package, you know.

1:15:2.370 --> 1:15:29.540  
ANR - Catamount NL D215  
They've been around for a long time, well, not around so long in our in our, in Vermont and the Northeast perhaps. But when they're originally designed, of course they were designed to deep package package goods. I think there are some of them are really good at that. Some of them are less good at that. I see Craig Cokers online, he could probably tell us all about that. But when done well, I think they are incredibly effective and a much better option than what was happening to a lot of that package material, which was often incineration and landfilling, which we know is really bad.

1:15:31.120 --> 1:15:31.540  
ANR - Catamount NL D215  
But.

1:15:32.540 --> 1:15:45.670  
ANR - Catamount NL D215  
Uh, I think it's what we've seen in our scenario, for instance, is not quite half, but a considerable amount of the source operator organics that you stick came from restaurants, cafeterias, homes, residences.

1:15:46.860 --> 1:15:56.950  
ANR - Catamount NL D215  
They used to go into compost production into soils into returning those nutrients in our local community is now going through deep packaging and I would argue unnecessarily.

1:15:59.150 --> 1:16:18.360  
ANR - Catamount NL D215  
To then be, you know, brought to anaerobic digestion, make energy and and then there we have all the complications that are the concerns that are arising around contaminants when in that process. So my my hope and my preference is that we could figure out how to take the hierarchy as perhaps it was originally intended. Perhaps it wasn't.

1:16:20.30 --> 1:16:50.800  
ANR - Catamount NL D215  
And figure out a way to make sure that the packaging still remains a viable use that we there's a lot of package Venturi was 38% of the landfill waste according to that study a couple years back, a landfill organics waste is in packaged form. That's a huge amount that should go through deep packaging and recover those organics. I would argue that the rest of it preference should be given to the other the higher echelons in that hierarchy. And we should do as much as possible feed humans.

1:16:50.920 --> 1:16:54.90  
ANR - Catamount NL D215  
You feed animals and compost and and build soil.

1:16:54.720 --> 1:17:1.50  
ANR - Catamount NL D215  
So how to do that is where I I stumble and I and I I think maybe I I hear the enforcement.

1:17:2.100 --> 1:17:29.280  
ANR - Catamount NL D215  
Constraints and the concerns, but I think that it's really important that we take what I would you know and and acknowledging that the science is not quite caught up to us and that you know, ideally we'd have the life cycle analysis of compost and Android digestion all figured out. And Deepak, but we don't. And so barring that, I think it would be great if we could acknowledge that I think Vermont has a history of valuing soil and and compost as an important end use for these nutrients.

1:17:30.680 --> 1:17:33.450  
ANR - Catamount NL D215  
And look at it a little bit differently and and try to.

1:17:33.960 --> 1:17:47.480  
ANR - Catamount NL D215  
Uh, give preference to these foods that don't need deep packaging to go to compost first when it's available, when there's capacity, which is not always the case, certainly. And then as a last resort, go to.

1:17:48.890 --> 1:17:53.130  
ANR - Catamount NL D215  
The packaging where those technologies exist and it's applicable.

1:17:53.920 --> 1:18:8.470  
ANR - Catamount NL D215  
Umm, so I don't know how to do that, but I think it's. I think it's an important thing to consider and I think you know there's a lot of people would argue that the hierarchy points to that already and it's just a matter of enforcement. And I understand that the enforcement thing is a tricky one, but.

1:18:10.0 --> 1:18:28.430  
ANR - Catamount NL D215  
I'd like to see the packaging primarily as as as a last resort for everything that's not packaged food waste and an important last resort because we have a we I think we don't have even at our facility, we don't have that much capacity and we would like to see some of our source separated organics still be processed, probably even added deep packager.

1:18:29.630 --> 1:18:32.850  
ANR - Catamount NL D215  
Within our county and within our region, but.

1:18:33.520 --> 1:18:38.400  
ANR - Catamount NL D215  
I think I feel like compost and soil building should be given priority and I don't know how to get there.

1:18:40.240 --> 1:19:11.610  
ANR - Catamount NL D215  
Said Dan. I will point out that our our hierarchy has composting and digestion on the same level and we flipped that a little bit from what EPA has, which has composting lower than in Robic digestion. So there's a couple different versions there, but this one there is an EPA, EPA reached out to me on a study they were doing looking at the hierarchy and it had some interesting initial results. Actually incineration was potentially higher than anyone had thought in the initial draft of that. I don't know if that's out yet.

1:19:11.680 --> 1:19:24.440  
ANR - Catamount NL D215  
But surprising to me, but let me stop talking with Bill. I've been I've no, I'm perfectly. You wanna go or or client to listen to the room? Really. Connolly. And then I'll go back to Peter Blair after that and then.

1:19:25.500 --> 1:19:37.120  
Billy Connelly  
Yeah, thank you. So as you folks know, my company takes in a good amount of food waste from a number of food waste generators, some pretty frequently and some are rather occasional.

1:19:37.950 --> 1:19:38.940  
Billy Connelly  
Generators.

1:19:40.190 --> 1:19:51.180  
Billy Connelly  
Because our system is a biomimicry system and not an actual biological system, we have a lot of different requirements and more flexibility than those folks who.

1:19:51.850 --> 1:20:4.300  
Billy Connelly  
Use food waste for livestock feed or that will end up in in the presence of human beings. You know, we can take things with a variety of different PH's. We can take material that has caustic in it, for example.

1:20:5.250 --> 1:20:8.880  
Billy Connelly  
One thing I am curious about with regard to the food recovery hierarchy is.

1:20:9.720 --> 1:20:11.210  
Billy Connelly  
That the development of it.

1:20:12.470 --> 1:20:25.120  
Billy Connelly  
I'm not sure where where I could find definitions of higher and best use and what was used to calibrate highest and best use and whether or not CO2 emissions was part of that.

1:20:25.750 --> 1:20:31.640  
Billy Connelly  
That discussion, and I think ultimately what I would love to see us working toward is.

1:20:33.340 --> 1:21:2.190  
Billy Connelly  
In addition to defining what the role of deep packaging is in the food recovery hierarchy, also looking at the use of packaging and our reliance and unpackaging and what that packaging is made of. And it's not just a Vermont problem, it's a systemic problem. We are addicted to plastics. We use them because they're convenient and cheap. But ultimately, if those were removed from this entire equation, we wouldn't even be having this discussion.

1:21:2.580 --> 1:21:8.130  
Billy Connelly  
So I think that's ultimately where I would like to see us pointed is toward, you know that loftier.

1:21:9.310 --> 1:21:9.880  
Billy Connelly  
Outcome.

1:21:14.50 --> 1:21:15.160  
ANR - Catamount NL D215  
OK. Thanks Billy.

1:21:17.240 --> 1:21:21.140  
ANR - Catamount NL D215  
Like can I go to Peter and come to you, Peter? Go ahead. I'm sorry to have kept you waiting.

1:21:21.730 --> 1:21:52.580  
Peter Blair  
Ohh no worries at all and I'll be really brief. So I tried during the initial portion to just have an objective kind of evaluation of what the law says now, but I really do think you need to be figuring out where you want this to go. So now with my advocacy hat back on, I think there's kind of three key components. I think the agency really needs to continue to do the outreach, the support to all generators and all Vermonters to educate them on the importance of the hierarchy, the values in it, as well as the importance of source separation for creating the clean stream that's necessary.

1:21:52.640 --> 1:21:55.990  
Peter Blair  
To push food waste up to the higher uses.

1:21:56.990 --> 1:22:27.180  
Peter Blair  
I also think there should be guidance if it is going to be considered a policy for how the agency will evaluate new technologies, including D packaging to see the impacts they will have on the hierarchy and potentially set boundaries to limit the ways that it will kind of create that race to the bottom. That was already discussed, kind of funneling things towards the lower uses and then just this is on my mind because I was looking at the other statutes on the question of applicability and enforcement of the hierarchy. One option could be.

1:22:27.340 --> 1:22:58.470  
Peter Blair  
Have it applied to everyone, but only have a kind of formal regulatory framework for the large generator. So create a definition of large food waste generators and have them have to kind of go through that manifest process that was being discussed. I mean, they're the ones that are creating in line share the food waste. They're the ones easier to regulate because it's not at a home or apartment basis. And for the most part, they're the ones who have edible food that could be donated that could be given for use as agricultural purposes.

1:22:58.850 --> 1:23:5.40  
Peter Blair  
As someone who home compost, you know, I don't really have edible food I can donate. It's just food scraps.

1:23:6.380 --> 1:23:11.550  
Peter Blair  
So those were just kind of my initial thoughts, but wanted to share them before that meeting ended.

1:23:12.750 --> 1:23:13.780  
ANR - Catamount NL D215  
Peter, thank you.

1:23:15.690 --> 1:23:45.600  
ANR - Catamount NL D215  
Like you want. Yeah, I think my big thing was who determines highest and best use. That was one of my my top questions. And then, you know, looking at the hierarchy, there's gonna be challenges anywhere you are on that hierarchy. I mean, you say food for animal and that opens up a whole another can of worms, right. How do you do it? What are the unintended consequences? Other things like that. So I mean, well, we've been going down this journey looking at, you know, Deepak or composting. And we obviously have run both operations. There's challenges in both locations. So how do you.

1:23:46.760 --> 1:23:52.300  
ANR - Catamount NL D215  
How do you make sure you're not, you know, feeding pigs meat and swine flu? Like there's a whole other list of?

1:23:52.960 --> 1:23:58.590  
ANR - Catamount NL D215  
Things that you need to consider, and I think that's where this group should be focused too, is. Yeah, we can pick a.

1:23:59.630 --> 1:24:8.620  
ANR - Catamount NL D215  
We can pick a different direction, but at the same point there's gonna be things that and details that you need to to vet through there. And then one of the biggest things is from a hauling perspective is just.

1:24:9.300 --> 1:24:39.470  
ANR - Catamount NL D215  
What do we do when we have contaminated material and everyone's gotta camera? Everyone's got a cell phone and they're stopping photos and you know, we're trying to to we educate and we have great policies and procedures for our drivers, but at the same point in time, like they're trying to make a game time decision, do we send it to the compost yard or do we not? And I'm sure you've dealt with it too, where sometimes you have to say, hey, we're gonna charge you as trash and we're gonna send another truck. And that's the kind of the stick method right where we're saying, hey, here's your here's your.

1:24:39.570 --> 1:24:43.330  
ANR - Catamount NL D215  
We're going to charge you for the pick up of the compost, but we're also gonna charge you the contamination.

1:24:44.50 --> 1:25:3.870  
ANR - Catamount NL D215  
Hopefully it cracks up behavior, but some consumers are just going to still put their own materials in there, which we we deal with it, but technically, are we allowed to put that in the landfill because it's contaminated and it's got food waste, right. Right. That's something squarely on our radar too. And Dan mentioned it in the last meeting. And I'll Colorado that has some some issues with.

1:25:4.820 --> 1:25:14.90  
ANR - Catamount NL D215  
Source separated organics that are so contaminated that they're they're just sending it to the landfill, so there's it's a, it's a tight, tight tight wire to to walk across for sure, but maybe.

1:25:15.820 --> 1:25:45.710  
ANR - Catamount NL D215  
So we have time check 11:00 o'clock at half an hour left. I actually wanted to acknowledge Peter Blair. I thought that was an interesting suggestion he had, and I'm looking at Tom. Like, we're getting into the suggestion space maybe. And I wanna see if others have reactions to ideas or because I think Ben and I had hoped and me were talking about, like, maybe you could come up with some initial bullets on this part. You're thinking I I did wanna have a chance to just share my. Yeah, I would like to hear your industry experience too.

1:25:45.790 --> 1:25:52.350  
ANR - Catamount NL D215  
So so Skip 2 two things that for those of you that don't know me in terms of of my contacts.

1:25:52.490 --> 1:26:10.240  
ANR - Catamount NL D215  
The one I've been in Vermont doing this work since 2000 and have been working on basically the URL or what became the URL since that time. So by the time we got to legislation I had been on that topic for 12 years.

1:26:11.920 --> 1:26:14.510  
ANR - Catamount NL D215  
And now, in my present capacity.

1:26:15.690 --> 1:26:24.80  
ANR - Catamount NL D215  
We collect discarded food from a whole variety of generators, the entire scope or spectrum, rather of.

1:26:24.910 --> 1:26:33.660  
ANR - Catamount NL D215  
Generators that exist in our communities. So it's everything from elementary schools and daycares to nursing homes and hospitals to prisons to industrial food processors.

1:26:34.420 --> 1:26:39.490  
ANR - Catamount NL D215  
To state office buildings, to courts to, you know, you name it, restaurants we were in there.

1:26:41.10 --> 1:26:52.190  
ANR - Catamount NL D215  
And we then bring that material back and run it through a flock of 2000 Langhans and then forged them on a compost forage. And then we make compost and worm castings from that.

1:26:53.180 --> 1:26:57.730  
ANR - Catamount NL D215  
We do other things, but just to contextualize sort of my experience, so I think.

1:26:58.680 --> 1:27:5.350  
ANR - Catamount NL D215  
One, I just one of the on a personal level when it comes to the intent, I can't say what the intent was of anybody.

1:27:6.980 --> 1:27:18.340  
ANR - Catamount NL D215  
Every single person who voted on the legislation, but this section of the law and Peter is very thorough and noted that it was not in the original draft.

1:27:19.300 --> 1:27:43.20  
ANR - Catamount NL D215  
Was was authored by myself and Pat Sugui, who is then the composting association director of Vermont and ultimately went through the council of Kathy Jameson. So Kathy certainly did get what the intent was that we were developing it, and then we later testified on the issue. And so the legislators in the committee rooms were aware of what the intent was. That's the part I can say is that part of the history.

1:27:43.950 --> 1:28:9.370  
ANR - Catamount NL D215  
The whole premise and why it was when we realized that or why wouldn't we looked at that first draft that we decided something like this was necessary is that for those of you that aren't involved in solid waste, especially in Vermont, Vermont had passed Act 78 previously, which was a voluntary compliance goal, and it pointed towards 50% waste reduction by 2005. And when I showed up.

1:28:10.990 --> 1:28:22.660  
ANR - Catamount NL D215  
Nobody even knew about it anymore. Anr was not talking about it publicly in terms of hitting that 50% goal, and we were at 32 percent recycling with no like, really meaningful change on the on the horizon.

1:28:23.710 --> 1:28:54.140  
ANR - Catamount NL D215  
And I think that they'll takeaways from Act 78 and many, many other well intended pieces of of past legislation to change social behaviors. Is that voluntary compliance as wonderful as it sounds, is not effective when it comes to some of these things. I'll come back to that in one second with my own experiences, a holler and what I observe where people don't always make one economically good decisions for themselves or they have other more complicated math like convenience to factor in.

1:28:54.630 --> 1:28:55.100  
ANR - Catamount NL D215  
Umm.

1:28:55.780 --> 1:29:7.810  
ANR - Catamount NL D215  
But two, we just we we have not actually addressed major social challenges through fraud statements that say we really would like you to do this. We often have to create more structured approaches to it.

1:29:8.690 --> 1:29:9.90  
ANR - Catamount NL D215  
Umm.

1:29:9.860 --> 1:29:19.800  
ANR - Catamount NL D215  
So so activity had not worked and the URL was the answer to that. And then the also sort of the like leaping US forward into a new vision for the food system.

1:29:20.530 --> 1:29:32.590  
ANR - Catamount NL D215  
But the other part is that leading up to the URL were years of stakeholder meetings that included food rescue included composting, included digestion, included all of these parties. I mean hundreds of people.

1:29:33.270 --> 1:29:33.920  
ANR - Catamount NL D215  
And.

1:29:34.890 --> 1:29:48.300  
ANR - Catamount NL D215  
Part of what came out of that was not only do we need more mandated structures, but we also need to provide greater acuity in terms of what we were trying to point towards, so that.

1:29:49.70 --> 1:30:3.340  
ANR - Catamount NL D215  
Economic value did not override social and ecological value and I think historically it would be hard pressed to make an argument that we have seen markets behave in ways that are for the greatest social and ecological good.

1:30:4.270 --> 1:30:21.520  
ANR - Catamount NL D215  
Markets and individual companies tend to behave towards their own bottom line towards what is going to work for them. And so while that doesn't make them necessarily bad people, it also makes them unreliable actors for making what our highest and best use decisions highest and best use is certainly a complicated thing.

1:30:22.620 --> 1:30:44.470  
ANR - Catamount NL D215  
We at the time we're trying to draft something that was a whole systems approach and that's a big thing that came out of those stakeholder meetings was we need to look at this as the whole system. And so while we as a society tend to put a lot of economic value on energy, for instance, historically we have not put any value on soil. We have not put any value on food security.

1:30:47.90 --> 1:31:0.180  
ANR - Catamount NL D215  
So exactly whether this hierarchy is drafted in the most perfect way, it's it. It is a bit up for grabs, certainly could use some diving into and yet the assumption was for instance food recovery.

1:31:1.210 --> 1:31:16.370  
ANR - Catamount NL D215  
If you evaluate it not just if you evaluate it just on a carbon sense. If you don't have to grow more food and get more food to people, and you can just take something that exists and reallocate the resource that's got to be the most efficient possible way to deliver food to people in an urgent emergency situation.

1:31:17.730 --> 1:31:36.780  
ANR - Catamount NL D215  
Having to produce food in California to get shipped to Vermont to then give to food insecure family in Vermont, that's just not efficient. It can't be efficient on the carbon basis. It can't be efficient on a dollars basis if it exists. If it has no market value, just pivoting its allocation, that is a vision. And that was the basic kind of premises we went down.

1:31:37.330 --> 1:31:45.920  
ANR - Catamount NL D215  
Umm. And there are many things like ecological services that soil provide that for instance, soil health. You know that we need to be accounting for in these things.

1:31:47.560 --> 1:32:15.470  
ANR - Catamount NL D215  
The other part to it is that originally soil building activities were established higher in the hierarchy and it wasn't so much compost versus methane. It was just really like, are we a fundamentally building soil or are we just producing electricity? So something like incineration didn't have much value because it was that carbon molecule was done. We no longer could put it back through the system. The more recent version. And This is why part of the intent part I think is has been well established is that.

1:32:16.60 --> 1:32:32.970  
ANR - Catamount NL D215  
My understanding is that and our came back and said no, we really think you know, we want to just keep this simple and compost indigestion. We'll just put them in the same sort of bracket and we, you know, we decided to compromise on that. And it was a more straightforward thing. And then energy recovery kind of ended up as the 5th item.

1:32:34.330 --> 1:32:36.560  
ANR - Catamount NL D215  
And then the other part I just want to say is as a hauler.

1:32:38.60 --> 1:33:10.30  
ANR - Catamount NL D215  
I've had two experiences, three experiences, that sort of that inform the hierarchy for me. One, we've taken the hierarchy so seriously that we write it into our contracts with our generators, and we acknowledge that you can't use somebody you know you can't like moonlight with within your contract with us, for somebody doing something lower on the hierarchy. But if somebody comes in like the Food Bank and offers you a service, that would mean that you are diverting away from our contract. If it's above us in the hierarchy.

1:33:10.190 --> 1:33:10.850  
ANR - Catamount NL D215  
We're good with it.

1:33:11.530 --> 1:33:25.250  
ANR - Catamount NL D215  
So, and that's how seriously we've taken it. The other part is that the first company to bring deep packaging to Vermont originally came in and wasn't offering services in subbed out to everybody in state.

1:33:26.140 --> 1:33:46.740  
ANR - Catamount NL D215  
And when I sat down with them for sort of contract negotiations, it was acknowledged I was concerned about losing grocery stores to them and it was acknowledged to me by one of their top management who came out to the farm that what they were doing in Vermont couldn't or what they were doing elsewhere could not happen in Vermont because of the hierarchy.

1:33:47.480 --> 1:34:1.40  
ANR - Catamount NL D215  
And that deep packaging would preclude these other things. And so he his answer to my concerns was you have nothing to be concerned about, your state insulated eating animals, which is what I do in ways that Maine, Massachusetts, New Hampshire, hadn't at that point.

1:34:2.440 --> 1:34:24.870  
ANR - Catamount NL D215  
The last piece is that we serve as a whole variety of folks and I would say even in places where the food bank is coming in for one reason or the other within there, plenty of edible food does not get recovered. Yeah. And so this is where that piece about, like, really being more structured, even though a donation to the food bank is cheaper than, say, deep packaging. On the other hand.

1:34:25.550 --> 1:34:40.100  
ANR - Catamount NL D215  
Convenience is hard thing to like. Put your finger on and and I think a lot of these bigger operations really are they. They wanna keep it simple. They don't want their people to have to make decisions. And so it all kind of tends to trend in one way and so.

1:34:40.820 --> 1:34:46.310  
ANR - Catamount NL D215  
Umm, the the reliance on that idea that the market alone will make sense.

1:34:47.420 --> 1:35:0.760  
ANR - Catamount NL D215  
I think is naive and it's sort of like this purist interpretation of markets that doesn't really reflect like the actual truth of them. And even Adam Smith described those things. It's not something that we've had to learn recently.

1:35:2.180 --> 1:35:3.200  
ANR - Catamount NL D215  
So that's what I got.

1:35:8.170 --> 1:35:20.70  
ANR - Catamount NL D215  
Umm one question I would have and I don't know if you've had any experiences, but it as long as I understood what you said. Ohh so your company has the hierarchy built into your contracts.

1:35:21.580 --> 1:35:32.330  
ANR - Catamount NL D215  
That's kind of a real world experience of navigating these hierarchies. Have you had to bring that to bear? And kind of like force that situation to work through?

1:35:34.540 --> 1:35:38.650  
ANR - Catamount NL D215  
You know, navigating that hierarchy, because I think that's something that potentially.

1:35:39.720 --> 1:36:5.300  
ANR - Catamount NL D215  
Inner would have to do and just. If you've had experiences of sorting through that challenge, that would be informative. Yeah. I mean, obviously I'm not in a position of like enforcing I'm in a position of participating in a sense. So yeah, so, you know, some of the aspects of that is Josh mentioned pig farmers. And that piece about sort of animal feed. But we have the Agency of Agriculture that already has guidance on that. I don't think the hierarchy or and are the legislature needs to clarify those things.

1:36:6.20 --> 1:36:11.110  
ANR - Catamount NL D215  
So a lot of where food scraps go to pig farms is being used illegally.

1:36:12.310 --> 1:36:40.190  
ANR - Catamount NL D215  
And so in those cases, for instance, you know we're not going to report somebody, nor are we, unless it there's some, like public health or whatever. But like generally it's not something we take on and as enforcing we don't even hold it over people's head. That's the last sort of way we wanna be perceived in the market. But we do provide written documentation from the agency mariculture as to those policies. So that would just be one place that we help guide people and then basically especially.

1:36:41.310 --> 1:36:41.740  
ANR - Catamount NL D215  
You know.

1:36:42.880 --> 1:36:43.770  
ANR - Catamount NL D215  
Since the.

1:36:45.250 --> 1:37:0.180  
ANR - Catamount NL D215  
Coffee shops are mostly coffee grounds. We're not really talking a lot about food recovery with them sort of parting with, Josh said. But if we go into a grocery store, when we do our initial sort of visit and sorting out where things go, we we come in with the assumption that.

1:37:1.230 --> 1:37:15.980  
ANR - Catamount NL D215  
That's that. Sorting edible food out is part of what they should be doing, and we help actually undermine our own market by clarifying like these things. Like, really you could be recovering that. And here's the number to the food bank in your local food pantry and.

1:37:17.410 --> 1:37:21.480  
ANR - Catamount NL D215  
And so it's it's more of a partnering role than like an enforcement role.

1:37:22.340 --> 1:37:32.650  
ANR - Catamount NL D215  
That's a little bit to the point about the need to animals. It's particularly challenging for us at the transfer stations where where we have to provide collection bins for compost.

1:37:34.10 --> 1:37:48.350  
ANR - Catamount NL D215  
To to take that to a pig farmer, we have no way of guaranteeing that that product has not come in contact with me. Right. Well, you wouldn't be able to take it to a big farmer anyway. Well, they come and ask us for it. And we say no.

1:37:49.620 --> 1:38:9.920  
ANR - Catamount NL D215  
You know, but I don't know that everybody does that, you know, so that's kind of I think what we're gonna getting out with the challenge of the right unintended consequences. I think the larger companies too from animal feed standpoint that they just don't want the liability. I mean we've seen a Deepak where we get stuff in and it's like how did these nuts and bolts get into this?

1:38:11.120 --> 1:38:14.670  
ANR - Catamount NL D215  
Other then it's because someone swiped off the floor and put.

1:38:15.430 --> 1:38:44.980  
ANR - Catamount NL D215  
Material and that they shouldn't be in it. You know that happens from time to time down the chain system. So it's if you have a large manufacturer that's sending a lot of material and they're gonna send it to an animal, they really have to have 100% quality control where it's almost more mechanized where the foods not being there's no way for a human to interrupt with that process where they know the materials really good. If you get sent. And most of the stuff that we get from grocery stores is more stuff that doesn't meet human health consumption, right. Like, it's sad out on a dock and then.

1:38:45.660 --> 1:39:9.980  
ANR - Catamount NL D215  
But it would. They got too warm, right? Cause in the summer. And now we have to dispose of all this lettuce or whatever it may be. I think that piece about the what's ending up in there, that's where these and Peter mentioned, you know, the source separation and the hierarchy. You know they are. They point towards each other. And so I think that in order to preserve those opportunities on the hierarchy, that's where enforcing source separation in part.

1:39:10.800 --> 1:39:15.910  
ANR - Catamount NL D215  
Is so critical, you know, and that's a big piece of our business is making sure that it's speed, quality you know.

1:39:16.460 --> 1:39:17.40  
ANR - Catamount NL D215  
Yeah.

1:39:19.220 --> 1:39:26.970  
ANR - Catamount NL D215  
Did the did you have questions from committee members that aren't present that you wanna? I did not.

1:39:29.880 --> 1:39:32.290  
ANR - Catamount NL D215  
Ohh Billy's gonna see Billy. Billy, go ahead.

1:39:33.610 --> 1:39:40.720  
Billy Connelly  
Yeah, I think that raises with what this discussion is focused on recently raises a a question I.

1:39:41.340 --> 1:39:42.580  
Billy Connelly  
Be curious to hear from.

1:39:43.500 --> 1:40:14.40  
Billy Connelly  
An economist or somebody from the Department of Labor or somebody from the the Groceries Association or someone like what has the pandemic done and what do we have now for a labor pool where, you know, like Tom saying that source separation is something that they should be forced to do well, do they actually have the staff to do that? Are there enough people working in the grocery stores now to actually comply with that, even if it was enforced? Or would we be putting undue burden on the grocers and others to actually try to comply with it?

1:40:14.540 --> 1:40:26.240  
Billy Connelly  
And I'd be curious, you know, what does that look like from an economic perspective or just from a real life perspective? Like, can they actually do that or are they just so bare bones skeleton crews that they just can't do it anymore?

1:40:28.910 --> 1:40:29.370  
ANR - Catamount NL D215  
OK.

1:40:32.320 --> 1:40:38.400  
ANR - Catamount NL D215  
And we can try and add that to that list, Ben, right, that question that Billy just posed, maybe within the document.

1:40:40.520 --> 1:41:0.260  
ANR - Catamount NL D215  
I think the big thing too is capacity. I mean, I think that's gotta be answered depending on where you are in the state, what capacity you have and having a good way to vet through that like you like Dan said. Like you may have capacity today and he might not flow as you get some new account and then that changes the whole equation of where we can ship material. Yeah, and it doesn't stop coming for me. Yeah, right like.

1:41:1.840 --> 1:41:30.670  
ANR - Catamount NL D215  
Yeah. So one thing, one thing that changed in that in that 2019 amendments, I think and I think was in the original language, but inadequately and I'll take responsibility for the inadequacy of it because I just looked back on my own naivety at the time of when we were drafting that. But there were provisions essentially say you're only held accountable to this if services are available to you and that would.

1:41:31.0 --> 1:41:43.720  
ANR - Catamount NL D215  
Capture the capacity thing. In part you know. So if if the food Bank is saying we can't get a truck to you and nobody is able to get edible food collection going for you, you know you can't be held accounts or you shouldn't be held accountable to.

1:41:45.100 --> 1:42:10.370  
ANR - Catamount NL D215  
Doing something that's just not available to you and the way it was written in before was most was very sort of kind of compost centric in that it basically relied on a mileage to a certified composting facility, which was a very inadequate reference point because for instance, I'm not even a certified composting facility myself, I run a farm and we use it for our cultural purposes. So that I wouldn't have.

1:42:11.670 --> 1:42:12.720  
ANR - Catamount NL D215  
Necessarily triggered that.

1:42:13.930 --> 1:42:25.140  
ANR - Catamount NL D215  
So I think there are other ways in which two ways we we could be offering clarifications, some of which might echo a little from the past to say essentially you know this is all this is what you're required.

1:42:26.60 --> 1:42:30.60  
ANR - Catamount NL D215  
Could those services be available which would capture things like capacity issues?

1:42:31.860 --> 1:42:40.330  
ANR - Catamount NL D215  
And I think that that might be one of those things that we wanna come back to is like, you know, figuring out what the actual triggers are to for.

1:42:42.620 --> 1:42:44.240  
ANR - Catamount NL D215  
For the application of color.

1:42:45.130 --> 1:42:46.610  
ANR - Catamount NL D215  
For the hierarchy specifically.

1:42:49.40 --> 1:42:50.870  
ANR - Catamount NL D215  
Yeah, we have 10 minutes left.

1:42:52.230 --> 1:42:56.520  
ANR - Catamount NL D215  
And I I well, I think we've gotten in some stuff today which has been good.

1:42:58.60 --> 1:43:14.770  
ANR - Catamount NL D215  
I don't have any definitive bullets and I don't know if you do. If we, you know from this group that you guys have wanted to, there's definitely been some good suggestions that I think are in the notes that are starting point for some of the challenges with the hierarchy as a.

1:43:15.740 --> 1:43:23.850  
ANR - Catamount NL D215  
Moving it beyond the way the the agency interprets it and uses it now, but also some ideas of on.

1:43:25.50 --> 1:43:26.860  
ANR - Catamount NL D215  
Places that could be.

1:43:28.320 --> 1:43:31.920  
ANR - Catamount NL D215  
Yeah, I guess ideas from Peter as as weighs the agency could.

1:43:32.560 --> 1:43:35.210  
ANR - Catamount NL D215  
It should work with the largest generators there was also.

1:43:36.530 --> 1:43:39.80  
ANR - Catamount NL D215  
Now you had asked about, you know, could A&R.

1:43:40.700 --> 1:43:43.220  
ANR - Catamount NL D215  
Talk about different examples of how.

1:43:43.930 --> 1:43:46.630  
ANR - Catamount NL D215  
Uh, you know, ideas it has on what?

1:43:48.100 --> 1:43:50.960  
ANR - Catamount NL D215  
Could lead us more towards the insuring than 90% effective.

1:43:52.890 --> 1:44:3.190  
ANR - Catamount NL D215  
Capacity was brought up a couple of times and as challenges and there was also, you were just kind of riffing, ripping up where you were just saying there was the idea of.

1:44:4.200 --> 1:44:5.610  
ANR - Catamount NL D215  
Looking at previous.

1:44:6.580 --> 1:44:8.590  
ANR - Catamount NL D215  
Uh, interactions to.

1:44:9.400 --> 1:44:29.130  
ANR - Catamount NL D215  
You essentially essentially it's a check first type of the system we've been discussing, but Mike has alluded to some real world challenges both with drivers on the ground, both with few trustable waste which we've all many people here have experienced having having been practitioners in this space. So I think.

1:44:29.860 --> 1:44:37.640  
ANR - Catamount NL D215  
I guess I just want to ask participants. And so this goes for Billy Online and and the folks in the room, what do you wanna do next?

1:44:41.110 --> 1:44:43.40  
ANR - Catamount NL D215  
When's our next meeting, Mia for context.

1:44:44.520 --> 1:44:50.930  
ANR - Catamount NL D215  
I know I haven't heard from everyone on the 2nd October meeting for the Doodle Poll, but we have November scheduled.

1:44:54.330 --> 1:45:5.850  
ANR - Catamount NL D215  
I heard from Billy a request for maybe hearing from some other speakers, but there's also a speaker list that I think is already got some pretty in depth ideas to it, so you're gonna have to use your.

1:45:6.520 --> 1:45:23.740  
ANR - Catamount NL D215  
Because your people, well, and we do have a the Grocers Association Committee member who did speak to that part without additional testing. Yeah. And actually, if Aaron had been here, we probably would tapped her, give her perspective as well. And Jenna too, which I don't think she joined us today. No.

1:45:25.610 --> 1:45:39.650  
ANR - Catamount NL D215  
I think the other piece in terms of the practicality of these things and and and you know this you just mentioned Denny's name which is triggered this. There are some things that are perfectly edible that no food.

1:45:40.970 --> 1:45:55.860  
ANR - Catamount NL D215  
Emergency Food system organization like the Food Bank or the local food pantries. Watts, right, they they will not take pints of ice cream. I own nearly certain. Basically, you know, they they only focus on food recovery of good calories, not bad calories.

1:45:56.560 --> 1:46:9.150  
ANR - Catamount NL D215  
So there is another practical part to and I think this applies to the services part. That's why I feel like if we build in or rebuild in that that services provision the supplies as services are available, I think it could be that simple.

1:46:10.790 --> 1:46:22.40  
ANR - Catamount NL D215  
That would also not hold Ben and Jerrys accountable force feeding people ice cream are, you know, insisting that that the food bank take their ice cream, you know, that may be a unique stream that.

1:46:23.0 --> 1:46:24.820  
ANR - Catamount NL D215  
Trying to rescue that food is not.

1:46:26.940 --> 1:46:27.400  
ANR - Catamount NL D215  
Appropriate.

1:46:28.170 --> 1:46:42.300  
ANR - Catamount NL D215  
So I guess one thing I'm I've kind of heard throughout this conversation, I don't know where it goes. It's just that need for flexibility. You know it like the question of what is the best use. It's a question of timing. It's a question of.

1:46:43.50 --> 1:46:46.530  
ANR - Catamount NL D215  
Does an outfit one a certain product and I don't know.

1:46:47.740 --> 1:47:7.100  
ANR - Catamount NL D215  
How we move ahead with that, but that has been kind of consistent, if it's a contamination issue like it, it seems like they're does need to be some amount of flexibility. You think a services provision would allow for that. So that the food bank can speak for itself and that the food banks can then consulted, that's an adequate.

1:47:7.780 --> 1:47:11.810  
ANR - Catamount NL D215  
Trigger to provide flexibility that it not go to food rescue, for instance.

1:47:13.40 --> 1:47:13.970  
ANR - Catamount NL D215  
Yeah, I'm not.

1:47:15.60 --> 1:47:26.830  
ANR - Catamount NL D215  
Terribly familiar with the exact mechanism you're talking about, but something in there that does give folks that flexibility, so whether it is contamination, whether it's, you know, quote UN quote bad calories.

1:47:28.330 --> 1:47:36.450  
ANR - Catamount NL D215  
Yeah, it just sounds like that's an important piece of doing this work. I'm not exactly sure what the mechanism is and how to include it, but.

1:47:37.190 --> 1:47:39.460  
ANR - Catamount NL D215  
It it does sound like it's a theme I've heard.

1:47:40.830 --> 1:47:47.460  
ANR - Catamount NL D215  
There's gotta be some kind of generator knowledge in this process, too, right? I mean, the thing already know that it's contaminated.

1:47:48.790 --> 1:47:52.590  
ANR - Catamount NL D215  
Are they gonna bother with calling right? The food bank? No. Great, you know.

1:47:53.700 --> 1:48:24.60  
ANR - Catamount NL D215  
We're gonna go right to the option that they know they right said already. For instance, with the Animal theater. With this, we already have laws pertaining these things that say you can't send contaminated food to the food bank like we have the Good Samaritan law that protects you if there's something inadvertent that happens. And yet you have to also use good practice. And so if it's contaminated, I think a lot of these things are really in that capacity kind of already answered. You know, we don't have to reinvent the entirety of it. We can refer to existing law. What you're talking about.

1:48:24.140 --> 1:48:36.770  
ANR - Catamount NL D215  
Reminds me of the willing enable it, said principal. Maybe it is a really loose way to describe it, so I'm I'm going back to what is a food waste and and as I mentioned, like Casella.

1:48:36.950 --> 1:48:42.330  
ANR - Catamount NL D215  
Think of someone's team. We've talked about this and and actually with others too. Dan Goosen. I've talked about this a lot.

1:48:43.970 --> 1:48:48.370  
ANR - Catamount NL D215  
It's like if it's recyclable in a manner consistent with the hierarchy, so.

1:48:49.520 --> 1:48:49.970  
ANR - Catamount NL D215  
If.

1:48:50.670 --> 1:48:52.50  
ANR - Catamount NL D215  
There is a.

1:48:53.170 --> 1:49:22.680  
ANR - Catamount NL D215  
Yeah, like I talked about chemical concerns or biological things like there are there agency of agriculture has powers over recalls on apples coming into the state and they conflict with this law directly that they may require apples that have. And I'm looking at Morgan maybe there's an example you can get, but there's a fly larva that we're very afraid of for our apples it's Apple season. So anyway I don't want to get too down in the weeds on that but often the discussion is.

1:49:23.120 --> 1:49:23.790  
ANR - Catamount NL D215  
But you can.

1:49:25.390 --> 1:49:37.40  
ANR - Catamount NL D215  
Is the is the receiving facility that's in the hierarchy structure willing and able to accept it, and that is the way we're actively talking about what is banned.

1:49:37.720 --> 1:49:47.380  
ANR - Catamount NL D215  
And that like if it's not acceptable by any people on the hierarchy, then it's not a food residual. That's the interpretation I've taken and we've been using.

1:49:48.690 --> 1:50:8.60  
ANR - Catamount NL D215  
And we came up with this, this table of what materials might fall automatically be able to give the generator and their service providers clarity so they don't like dog food was thrown out originally. Like, is that a band material? And we said no, that doesn't seem like it's an intent of the food, the food waste band. So the willing enable part.

1:50:8.920 --> 1:50:24.360  
ANR - Catamount NL D215  
Applies also in the cake exam cakes. I have heard that food banks this is a national issue. Do not want the umpteen cakes and pastries and right because of the high sugar content and just they don't. They can take one maybe but they don't take 65 and that's where they draw that line.

1:50:25.740 --> 1:50:54.330  
ANR - Catamount NL D215  
Now that could be a way to look at the hierarchy was were they willing and able to accept it? Are they able? Is it regulated by agency of AG on pig feed? Right. But the the intermixing of meat, they're not able by law to do it. Are they willing? They're overcapacity. Nope. They're overcapacity that day. They can't take it. And it can. You know, that that is a way you could get into this space a little bit more, just offer it as a point in working through these topics. I think that's usual. Yeah.

1:50:55.580 --> 1:51:17.840  
ANR - Catamount NL D215  
I mean, you could just have a broad statement that says essentially this applies to the extent that there is a service provider that is willing and able to, right. So it would be helpful to describe what that means because then you get into interpreting that when is willing and able mean. But usually statute is pretty high level and then it and then it leaves it up to the agency. But in practice it's been.

1:51:18.760 --> 1:51:36.630  
ANR - Catamount NL D215  
Umm, there's been recalls of goods at the border that weren't allowed to be sold into the state technically, but people are processing making the food product here. They're only allowed to do their due to customs laws because they're gonna ship it out of state out of the country. And then if it becomes a waste, they need, they need to document.

1:51:37.330 --> 1:52:3.680  
ANR - Catamount NL D215  
Uh signed thing that it's been disposed the landfill or incinerator, and I've struggled to get composting and other options into that matrix because we have a lot to uphold as well. But I'm just telling what would be the reason that they wouldn't be allowed to? These are customs laws that if you're gonna make a product, you have to abide by the the country's laws. And if you're not going to, you can still produce it. As my vague understanding. But it has to be sold. It's not sold in this country.

1:52:4.440 --> 1:52:14.970  
ANR - Catamount NL D215  
But it which becomes a waste. Then it could easily make it into a grocery, like if they're not like, you know, if it gets donated, then it's then they've broken that covenant with the federal government and.

1:52:15.590 --> 1:52:17.780  
ANR - Catamount NL D215  
They they need a certificate of destruction.

1:52:18.570 --> 1:52:20.280  
ANR - Catamount NL D215  
In order to show that they didn't.

1:52:21.340 --> 1:52:39.690  
ANR - Catamount NL D215  
Really try and sell or involuntarily get this out into the marketplace. There's, I can remember what the product was. Lotus Seed was one that. Yeah, you fit that for us for some reason Lotus seed and popped into a cereal was not allowed for anything other than destruction because of some unknown thing.

1:52:40.580 --> 1:52:43.520  
ANR - Catamount NL D215  
These are again, we'll get down in the weeds and we're at time, but.

1:52:45.340 --> 1:52:51.480  
ANR - Catamount NL D215  
I think the policy we're talking about, the policy mechanism where the idea of willing and able something you could explore, that's it.

1:52:53.910 --> 1:53:0.400  
ANR - Catamount NL D215  
I think we've gotten a decent way into this topic. I think source separation has come up as well. It might be helpful.

1:53:1.390 --> 1:53:5.670  
ANR - Catamount NL D215  
To talk about both, there are comfortable to talk about in one space, they do interact.

1:53:6.530 --> 1:53:7.140  
ANR - Catamount NL D215  
Stressing.

1:53:9.180 --> 1:53:15.390  
ANR - Catamount NL D215  
So any last ideas about your next meeting, what you want to do at that time to guide us to help you?

1:53:16.250 --> 1:53:26.560  
ANR - Catamount NL D215  
I think it'd be helpful to hear from Jenna and Aaron, you know, with the same 5 minute kind of window since they weren't here today, just here their take and their experience on hierarchy.

1:53:27.230 --> 1:53:27.920  
ANR - Catamount NL D215  
Uh, and then?

1:53:28.550 --> 1:53:31.910  
ANR - Catamount NL D215  
Whether it bleeds into source separation, I'm not sure, but.

1:53:33.530 --> 1:53:48.400  
ANR - Catamount NL D215  
Yeah. I would say pick this conversation up, round it out with them and then try and work into that second bullet. Ohh, I don't know if we wanna try to pull together some bullet points for this first charge. Our next meeting.

1:53:49.650 --> 1:53:55.810  
ANR - Catamount NL D215  
Feels like a big task, but yeah, but I hesitate. I know in ours already doing a lot of work on this.

1:53:57.290 --> 1:53:58.950  
ANR - Catamount NL D215  
In between meetings and such, but.

1:54:0.80 --> 1:54:1.600  
ANR - Catamount NL D215  
I wonder about the.

1:54:3.30 --> 1:54:9.340  
ANR - Catamount NL D215  
Idea of exploring other options that aren't full enforcement, but also not just.

1:54:10.360 --> 1:54:13.10  
ANR - Catamount NL D215  
Aspirational kind of. Here's the hierarchy.

1:54:13.690 --> 1:54:17.0  
ANR - Catamount NL D215  
If there is room to come up with like what that could look like and.

1:54:18.100 --> 1:54:47.840  
ANR - Catamount NL D215  
You can try. Feel free to kick we we can try. You know the honestly Peter Blairs comment was the idea was the most one that I could see. There's there's a lot of examples of other states that are using different strategies of getting at that nonenforcement. That's what I was talking about before about not looking at just the end use but looking at the lifecycle stuff. So there's like date labeling or food to start. When does the food gonna be expiring? Then you can have it trigger of you know we're gonna use this. Can we move it on? It's a lot of different incentives and.

1:54:48.530 --> 1:55:14.240  
ANR - Catamount NL D215  
Things that other states are looking through, so we can probably pull that together pretty easily, including some of the stuff Peter talks about about a lot of states thought probably every other state, I think, except for us carves out to the section of the category of people are gonna be listening into. So over 2 tons and sometimes they restrict it to entity type. So supermarkets and exclude things like schools or whatever for whatever reason. So yeah, there's a lot of other examples that we can tap into. I can try to pull this together.

1:55:14.640 --> 1:55:15.10  
ANR - Catamount NL D215  
Umm.

1:55:16.430 --> 1:55:21.960  
ANR - Catamount NL D215  
Very briefly, do we wanna clarify who we want might wanna invite in?

1:55:23.260 --> 1:55:48.360  
ANR - Catamount NL D215  
2 things if we're gonna have a meeting in October and then we want to invite I think this is what we can look into all for I think that we like even though we haven't scheduled it. I think we agreed last time to have a meeting in October. Right yeah, I just gotta remind some folks cause I haven't heard that nothing will about we'll try to get you in October meeting and obviously that takes you guys to engage and we will come up with a straw agenda keep going on the hierarchy.

1:55:49.400 --> 1:56:13.810  
ANR - Catamount NL D215  
Maybe if we have time to work in source separation again to try and see, but to on the hierarchy, see if we can get some bullet ideas flushed out, even if they're not mute. Everyone supports them if they're just ideas that are possibly part of a report. Again, I can envision a report where there's disagreements on different policy ideas, but they're still part of a discussion. If that's. But again, it's gonna be up to you to approve that type of approach.

1:56:15.820 --> 1:56:24.610  
ANR - Catamount NL D215  
And what you asked about people, right, Tom? Coming. Yeah, just like whether it's for the hierarchy or or starting to look towards source separation just knowing.

1:56:25.350 --> 1:56:53.550  
ANR - Catamount NL D215  
We have a limited number of meetings we might want to tee up a couple people. Yeah, and there is an A document on the FTP site with the aggregation of all the recommendations, including the question that's trying to be asked or answered. So feel free to take a look at that and suggest any, you know, point people or top five that we should be trying to schedule for the next couple of conversations. Do we wanna create some structure for that so that there's so you actually have some guidance?

1:56:56.540 --> 1:56:57.440  
ANR - Catamount NL D215  
I mean, yeah, I.

1:56:58.410 --> 1:57:3.0  
ANR - Catamount NL D215  
Yeah, I think that's a good idea and we should just maybe designate some time.

1:57:4.0 --> 1:57:9.620  
ANR - Catamount NL D215  
Specifically, in what I hope will be in October meeting, if we give nudges to whoever we're waiting to hear from.

1:57:11.630 --> 1:57:12.430  
ANR - Catamount NL D215  
But if we had.

1:57:13.230 --> 1:57:24.180  
ANR - Catamount NL D215  
We know that we're going to be talking a little bit more about item one and probably going to item two. If there's some people that apply, if we, if we set aside, you know, 20 minutes or whatever for that again.

1:57:25.580 --> 1:57:30.450  
ANR - Catamount NL D215  
Maybe there's a way to determine who they are or sign off on who they are over e-mail.

1:57:31.700 --> 1:57:38.790  
ANR - Catamount NL D215  
Well, you have that FTP site. You guys. I mean, there's a lot we can do for you, but if you have a table you can vote, you could.

1:57:39.450 --> 1:58:1.930  
ANR - Catamount NL D215  
You know you can see in real time what everybody's chosen that I don't. I don't wanna put that out for too much work or or me or Mia, but we're willing to try and help you in that decision. I think we're getting at is like, how do we make the decision of who comes in? Yeah, and not leave it up to like, Port Ben, like doing all this collating of a lot of input. You know. So if you guys wanna set up a system.

1:58:3.60 --> 1:58:4.760  
ANR - Catamount NL D215  
Those yourself, but or or we can.

1:58:5.400 --> 1:58:20.650  
ANR - Catamount NL D215  
Or just take a look at that page. I'm how many just I mean I I got I don't most rather spend 5 minutes right now leaving here with like clarity versus having to I I haven't had a chance to look at it yet so I put some names in there so I I feel.

1:58:21.260 --> 1:58:33.670  
ANR - Catamount NL D215  
Bad asking people to go through it without I haven't even looked at it yet. So but there was like 6 recommended names to Ben. I just wonder if we could order them. Yeah, if we could just identify however, my dreams there.

1:58:34.960 --> 1:58:40.960  
ANR - Catamount NL D215  
Uh for uh are you saying on e-mail or just on the on the TV? Just do it on the site.

1:58:41.40 --> 1:58:47.690  
ANR - Catamount NL D215  
So just put one, we'll get search. Always put one for the first person you want, then you can. Yeah. And that way, Jenna.

1:58:48.570 --> 1:59:0.880  
ANR - Catamount NL D215  
Umm and Aaron, we could just ask you to add that column and then put your name at the top and then put your top through that. Is that we're gonna have two votes and then try to do that by Friday. Is that too soon?

1:59:1.770 --> 1:59:5.10  
ANR - Catamount NL D215  
I think we gotta get it done. So no, I think that works.

1:59:6.20 --> 1:59:9.930  
ANR - Catamount NL D215  
OK, I think we can e-mail you with that request to give us some directions.

1:59:10.10 --> 1:59:10.560  
ANR - Catamount NL D215  
Perfect.

1:59:13.600 --> 1:59:31.120  
ANR - Catamount NL D215  
I do wanna say thank you to everybody and our who's doing the background is still itation all. That's good, really well. All three of you guys and whoever else is punching in or doing really great. That was the largest. We're happy to do it. Doodle poll in terms of dates, I think I've been a part of. So thank you for that.

1:59:31.200 --> 1:59:37.30  
ANR - Catamount NL D215  
Wait here. But I'm not gonna do with much work that so. I'm not complaining. It's appreciated. So.

1:59:39.510 --> 1:59:50.150  
ANR - Catamount NL D215  
I well, I think we're just a little over, let's see where the FTP site voting ranking comes out and then we'll design an agenda based on that and and have to do it via e-mail with you guys.

1:59:51.750 --> 1:59:58.20  
ANR - Catamount NL D215  
Thanks for telling. Thanks for thanks for those Peter. Thank you for being a speaker. Billy Connolly, thanks for being here. Do you have a comment, Billy?

1:59:58.370 --> 2:0:1.20  
Billy Connelly  
I think no. Just thank you guys very much. Appreciate it.