

Received Comments 1-20 ballot

			
Category	Credit	Comments	Response
General		Why are you considering universities under the "Local Government Category." Why not just have a universities category?	SWEEP is in the process of developing a "Campus" standard that would apply to Universities, military bases and similar kinds of facilities.
General		The primary reservations I have with the document is that it attempts to equate or compare or provide "points" for environmental activity which is not transparently comparable. Whether a composting program is worth as much as the number of types of plastic collected (or perhaps "procurement" of recycled content plastic should be added, given the need for markets), is a slippery slope towards simply "selling" a certification label.	There is no such thing as a "scientific decision". Science and analysis gives us data, which we interpret and make judgements based on what we as humans or whatever cohort of decision makers we have convened believe is most important. In this case, the points are based on the data- or experience-supported value judgements of SWEEP committee members, based on the available data and the objectives of the system.
General		When someone with my experience has this much difficulty attempting to understand and rationalize a standard like SWEEPs, it can foretell a future where people in my position, with perhaps less experience, will feel pressured to "rubber stamp" changes.	SWEEP is a lot to absorb at once, but as people become more familiar with it, the relative changes will seem small compared with the first release.
General		I hope that the comments I made last spring, expressing concern over the vast differences in "generation" and "prevention" calculations, will be kept in mind as the effectiveness of this standard is measured in the future (if it proves not to work, it's essential that SWEEP say as much)	We are starting from a point of what we think we know and we will be under continuous improvement and continue to gather data and experience to get closer to the "correct" answer.
SMMP	Comprehensive Sustainable Materials Management Policy and Programs	Potential Solutions: "Require use of recycled materials so long as material is to spec, and cost is equal." Remove the words, "cost is equal," as there are instances where the upfront cost may be more than virgin material, however, the benefits and economics are realized in the long-run instead of the short-term.	We are trying to incentivize SMM choices when there are multiple factors that they are weighing. As the system develops we will continually raise the bar for performance.
SMMP	Comprehensive Sustainable Materials Management Policy and Programs	Require Highest and Best Use Hierarchy.	this underpins our approach.
SMMP	Comprehensive Sustainable Materials Management Policy and Programs	Clarify that incineration is for disposal - does not count toward diversion.	We believe that is clarified that incineration counts towards disposal right now. We will clarify in certification manual.
SMMP	Comprehensive Sustainable Materials Management Lifecycle Analysis and Policy Program	Require living wage, health insurance, and a safe work environment for all workers. These are basic worker rights that our industry should respect.	These elements have been incorporated into the standard.

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SMMP	Materials Processing Infrastructure and Market Development Policy	Add bonus Tier 3 Zero Waste Goal in 20 years - to reward those who aspire to reach for the stars through a longer mission.	We address this in SMMP credit 3.
SMMP	Adoption of Diversion and Recycling Goals	The "residue" rate should be clearly defined. If it means material that ends up being sent to landfill as a waste this should be treated differently than going to landfill as a beneficial use (i.e. ADC).	Residue rate, the treatment of ADC and other important definitions have been refined and will be fully described in the Certification Manual.
SMMP	Adoption of Diversion and Recycling Goals	My concern with the residue requirement for C&D is that it is unattainable even in the best recycling market! I think that a more attainable (but still challenging) goal is closer to 30%. From our experience with mixed C&D, getting below 20% is not a feasible level to set as a requirement. Looking at the other Certified mixed C&D facilities on the RCI website it seems like this is almost universally the case.	We will be seeking to verify in the pilot what the "correct" residue rate is for C&D. If field experience demonstrates that a different number from what SWEEP originally designated, governments and businesses looking to certify under the pilot will be evaluated on the field number and not the original number.
SMMP	Regular Waste Characterization and Generation Study Policy	Depending on the scope, WCS's are extremely expensive and results often stay consistent over many years (Every 7 years is a lot). Maybe consider allowing flexibility in this requirement.	SWEEP does not feel that 7 years is too short of a time window and if cost is an issue we are allowing for WCS to be submitted from a COG in order to reduce costs for the local government. In the certification manual we will consider providing guidance that if the smaller scale intermediate studies show small changes then we likely will not require a full study if it is not necessary.
SMMP	Regular Waste Characterization and Generation Study Policy	Policy development and evaluation of employee safety programs	SWC, PCR, and PCD all have credits that reward defined safety programs.
SMMP	Advanced Comprehensive Sustainable Materials Management Policy	Measure vehicle, disposal, and processing emissions gas footprint of each of the three major programs: trash, recycling, compost.	Added
SMMP	Solid Waste Greenhouse Gas and Air Emissions Footprint Reduction Policy	Adopting a company goal is entirely feasible. Setting these standards at which companies throughout the supply chain are required to meet however is not nearly as simple.	initially we will focus on Scope 1 and Scope 2 emissions. As knowledge develops, we start looking up-and-down the supply chain.
SMMP	Solid Waste Greenhouse Gas and Air Emissions Footprint Reduction Policy	"the best available technology" is quite broad... I think this is something that if included is best left to the municipality as a strategic approach/goal rather than an industry requirement. In NYC for example, regulators determine the standards for pollutant controls on trucks and at transfer stations, and the State of NY regulates landfills, and transfer stations and the industry follows.	Important to note that these requirements are in the policy section and do not require action to garner points. During the Pilot, we will review the combination of the results of state mandated emissions testing and aggregated over the company's fleet and implement requirements that best get at the intent of the credit with minimal hassle to the certifying entity. The point of the Standard is to go beyond minimum required practice.

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SMMP	Market-Based Waste Management Program Policy	Create a local citizen advisory board to advise on policies and annual budget formation.	We will include this suggestion in the appropriate credit(s)
WGP	MSW Source Reduction	When measuring Solid Waste and Recycling, is Multi-Family considered Commercial or Residential? Needs to be defined.	Different jurisdictions classify it differently. It will be according to the market. We will put expand on definitions and derivations in the Certification Manual
WGP	Litter Prevention and Reduction Infrastructure	Education and Engagement Programs on Litter & Source Reduction and Reuse Training on litter prevention is vaguely worded. Campaigns are not a proven method by themselves to change littering behavior. Consider rather than campaign, "establish continual litter prevention and reduction efforts which may include any of all of the following: government or civic based community organization, youth and adult education programs including behavior change, campaigns such as messaging" Option 1: Pursue as an independent entity. Option 2: Partner with an organization (i.e. non-profit)	We have incorporated these suggestions into the litter credits and will continue to improve them with feedback from the Pilot.
WGP	Litter Prevention and Reduction Infrastructure	Litter Prevention and Reduction Infrastructure Enforcement - add signage stating no litter or dumping which to section. Potential Strats: "Example methods include unified language, artwork, vibrant colors, and/or colors that coincide with universal understanding (i.e. blue for recycling, yellow for compost)". Has this changed? United States Composting Council (USCC) announced that they, along with five other participating nonprofits and government agencies, recommend designating green as the voluntary container color standard for organics collection containers.	We have implemented most of these suggestions and we will further define recommended practices in the Compliance Manual
WGP	Litter Prevention and Reduction Infrastructure	Add Litter Prevention measures/activities at public sponsored events in public spaces (e.g. prohibit disposables)	This was added to the credit
WGP	Environmentally Preferable Product Procurement (Non-Capital Items)	50% of rolling stock standard too low - raise to 90%.	We can revisit this at the end of the pilot, if the credit is too easily obtained we will consider making it more stringent.
WGP	Economic Assessment of Solid Waste Management Program	Breakouts for internal operating costs like disposal costs, recycling costs (gross and net), is proprietary compared to certain costs like MSW collection that are typically set by a municipality and posted publicly. There are many other ways to assess these costs without requiring that industry provide this sensitive data.	We are not looking for breakouts or any proprietary data. Looking for total cost to process one ton of mixed C&D; total cost to collect.
WGP	Economic Assessment of Solid Waste Management Program	Provide total costs of each program (recycling, trash, compost) per Household. I oppose the per ton measures, as they mean nothing to the citizens and to the city council and do not support cost efficiency comparisons. The real financial measure they care about is cost per Household. (I can provide an example from Austin.)	We have added a variety of potential financial metrics to the credit and will refine them as the system gains experience.

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WGP	Credit 11	Provide worker safety protocols and measures for accident prevention.	This is addressed; we will describe this more fully in the certification manual.
SWC	Household Hazardous Waste Collection Infrastructure	Drop Prescription drugs - Prescription Drugs are still regulated by the DEA and cannot be collected at HHW facilities.	Medical waste generated by households that ends up in the MSW system is a reality and we want to begin to address it.
SWC	Minimizing Emissions from Transfer Stations	50% of rolling stock standard too low - raise to 90%.	If the pilot finds that these levels are too low we will likely raise them.
SWC	Solid Waste Collection Cost Transparency	Add full cost accounting for transparency - where all costs are reported regardless of revenue sources.	We will evaluate accounting methods during the pilot and amplify in the Certification Manual
SWC	OSHA Compliant Practices and Safe Vehicle Processes	Add mandatory safety training for management staff.	Incorporated into SWC Credit 7
PCR	Minimize Bale/Output Contamination Rate	Require all incoming loads to reflect MRF material collection standards. (not in current practice today.)	We have strong incentives to reduce both inbound and outbound contamination in MRFs.
PCR	Producing High Quality Products from Recovered Organic Materials	Add higher Tier for compost standards meeting 95% certified	Tier 2 has this already.
PCR	Anaerobic Digestion Infrastructure	For operational and financial efficiencies, add Tier for co-operation with Wastewater Treatment Facility.	We will consider this for innovation during the pilot. Post pilot we will integrate biosolids and wastewater into the Standard.
PCR	Compact Commodity/Output Supply Chain	For Tier 3, Change from 25% to 50% of outputs sold or utilized within 50 miles. 25% too weak.	We will evaluate this credit during the pilot.

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PCR	Post-Collection Recovery Facility Safety Protocols and Training	Add mandatory safety training for management staff.	This has been incorporated
PCD	Material Disposal Cost Transparency	There is no mention of fugitive gas emission control. The singular measure is relative to the piping infrastructure and measurement system as well as EPA estimates of gas generation comparison. However, there needs to be stronger controls on fugitive releases not measured.	Fugitive emissions are estimated. We agree and will use the pilot to evaluate options for quantifying and mitigating these emissions.
PCD	Good Neighbor Practices	This is oddly worded. Should it be dust inspected and litter recovered?	We agree and will integrate clearer language.