

November 17, 2021

The Honorable Gina M. Raimondo
Secretary
Department of Commerce
1401 Constitution Ave, N.W.
Washington, D.C. 20230

**Re: Closing Dumpsites
ETTAC Recommendation 2021-01**

Dear Secretary Raimondo:

The Environmental Technologies Trade Advisory Committee (ETTAC) is a federally-established committee whose purpose is to advise on the policies and procedures of the U.S. government that affect environmental technologies, goods, and services exports.

ETTAC recommends the United States support initiatives, policies, and programs that encourage the closure of dumpsites in developing countries. Dumpsites are waste disposal facilities that do not include environmental controls such as daily cover, leachate management, surface water controls, groundwater monitoring, or emissions controls. These facilities emit methane¹, carbon dioxide, and other gases and therefore contribute to climate change, have frequent slides that result in deaths² and off-site contamination, and contribute to waste in waterways and the oceans. They also pose serious health risks to those who work at them or live on or nearby.³ Reduced methane emissions are key to achieving ambitious global climate goals.

The closure of dumpsites is a complex process which needs to be properly planned, including technical, environmental, economic, and social considerations. It also requires an alternative waste management system, adequate institutional capacity, and community support.

The closure of dumpsites in developing countries provides substantial commercial opportunities for U.S. companies. In addition to planning for the proper closure, which requires substantial technical expertise, dumpsites are typically replaced by more modern solid waste

¹ <https://www.sciencedirect.com/science/article/abs/pii/S0960852418315013> Landfills and dumpsites contribute 12 percent of the world's methane emissions. https://www.c40knowledgehub.org/s/article/Financing-landfill-gas-projects-in-developing-countries?language=en_US. This percentage will likely increase in future years unless dumpsites in developing countries are closed.

² <https://www.cnn.com/2017/03/15/africa/ethiopia-trash-landslide-death-toll/index.html> (Ethiopia dumpsite slide killed 133 in 2017); <https://geoenvironmental-disasters.springeropen.com/articles/10.1186/s40677-014-0010-5> (Indonesia dumpsite slide killed 143 people in 2005); <https://www.wastedive.com/news/report-global-dumpsite-hazards-led-to-750-deaths-in-7-months/426647/>

³ <https://rtfd.rt.com/stories/worlds-most-dangerous-dumps/>

processing and disposal facilities, including recycling centers, anaerobic digesters, transfer stations, sanitary landfills, and waste-to-energy (WTE) facilities. These new disposal facilities all use sophisticated waste sorting and management equipment, and have advanced combustion and/or emissions controls. In addition, new landfills provide opportunities to site landfill gas facilities which convert methane into renewable energy, and WTE facilities generate baseload renewable electricity to power the grid or steam for manufacturing.

The International Solid Waste Association (ISWA)⁴ and other organizations have initiated a global campaign to close dumpsites. This campaign has the support of major U.S.-based solid waste associations. A similar effort was recently launched on a regional basis in Latin America and the Caribbean.⁵ The U.S. government should support these organizations and these efforts.

Specifically, the United States should offer technical assistance and capacity building on how to properly close a dumpsite and provide for post-closure care, as well as expand its programs on how to plan for and properly construct and operate modern disposal, material recovery, and energy recovery facilities. The United States should also assist efforts that quantify the health and environmental consequences of improper waste management and provide innovative financing options to expedite the transition from open dumpsites to more modern and environmentally protective solid waste management facilities. Further, the United States should support efforts by all levels of government to establish the policies and infrastructure required for investment in a broad range of advanced solid waste management and processing, energy, and material recovery facilities, including regular curbside collection of both waste and recycling. Collectively, these facilities also contribute to a reduction in greenhouse gas emissions.

Thank you for your consideration of this recommendation and the Administration's efforts to reduce GHG emissions and marine litter, which would be advanced by implementation of this recommendation.

Sincerely,



William Decker
ETTAC Chair

CC: EPA Administrator Michael Regan

⁴ ISWA started the campaign in 2017 and has established a Task Force to manage it. <https://www.iswa.org/closing-the-worlds-biggest-dumpsites-task-force/?v=7516fd43adaa>.

⁵ <https://www.unep.org/events/publication-launch/high-level-launch-roadmap-closure-dumpsites-latin-america-and-caribbean>