

Appendix B: CJWG Feedback on Advisory Panel Recommendations

Climate Justice Working Group

Recommendations to the NYS Climate Action Council for Consideration in the Scoping Plan

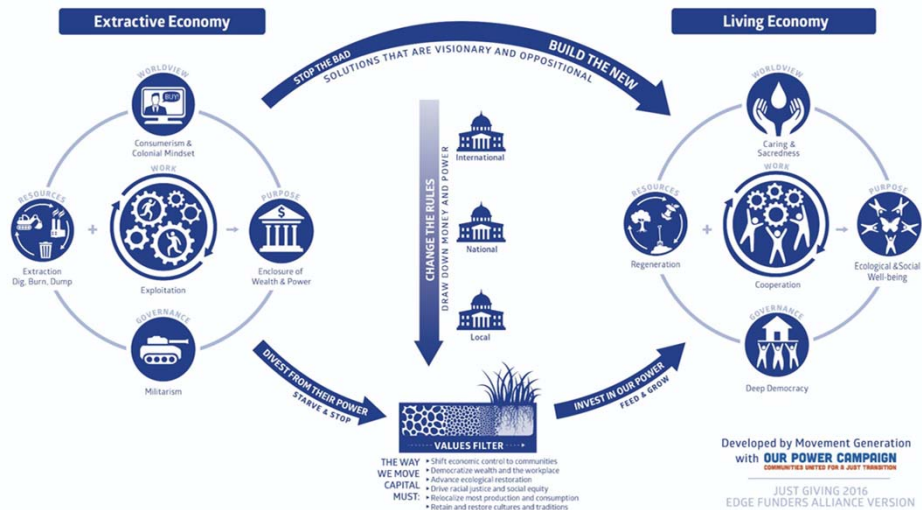
June 28, 2021



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Our Justice Lens and the Principles We Stand By

A STRATEGY FRAMEWORK FOR JUST TRANSITION RESIST — RETHINK — RESTRUCTURE



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Observations and General Impressions - Mainly on Transportation Advisory Panel Recs

- **Recognize that goals/benchmarks/accountability is essential**
 - The recommendations need clear guidance on how benefits/investments will be defined, measured, tracked, and shared over the long term
 - Scoping plan must ensure data is available to accurately measure the success of implementing the CLCPA
- **Better scrutinize every action for justice**
 - Some of the recommendations presented false market based solutions
- **Provide greater clarity, reasoning, and purpose**
 - Some goals such as the doubling of muni-sponsored public transportation appear arbitrary without an analysis on the basis of the target
 - Policies with significant implications like a feebate deserve more than a 'handwave'. *It sounds like 'free money'. How does it actually work in practice?*
 - Provide explanation of how the social cost of carbon was incorporated
 - Edit jargon to plain speak, and remove vague, squishy language and strive to provide key details



■ Increase ambition

- Fill in the gap of connectivity between regions of the state that rely on public transportation by prioritizing high speed rail and long range bus service
- Refine TOD Strategy to elevate its estimated GHG reduction impact by 2050 from medium to high by placing the most emphasis on VMT reduction
- Deemphasize vehicle electrification as the topmost solution as it fails to address SOV associated issues. This hinders our ability to address the root cause of runaway transportation emissions, and its related link to systemic issues such as racism and poverty

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Dangers of a market based approach to climate justice

Transportation Climate Initiative (TCI) Flaws

- Best available evidence shows cap and trade systems do not eliminate air pollution hotspots, and often exacerbate them
- Like RGGI, funds generated by TCI are vulnerable to budgetary raids by the Executive and Legislature
- Reforms to cap and trade are unlikely to remedy pollution disparities given the program's inability to surgically reduce mobile source emissions which are more complex to regulate than stationary sources
- The inherent design flaws of cap and trade result in environmental racism
- The inadequate involvement of EJ groups in the policy process reflects a profound failure of democracy, and bolsters the case for abandoning sector specific carbon pricing policies for a comprehensive carbon fee like that in the CCIA



PHOTO BY TIM PRINCE

Denial of Home Occupant Justice

- Protect LMI renters by amending the provision on new market rate housing within TODs that is currently limited to home ownership to include renting and rent to own options



Clean Fuels Standard Concerns

- Allowing high carbon fuel producers to meet their credit obligations by paying clean producers for their energy is a weak way to enforce the standard - as it lets them offset instead of eliminate their emissions - which by itself won't guarantee that emission reductions and investments in overburdened communities occur at the necessary speed and scale required by the CLCPA
- Clean air necessitates an 'electrify everything' approach.
 - Allowing vehicles to combust lower carbon liquid fuels that still emit criteria pollutants won't eliminate air pollution hotspots

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Recommended Additional Actions

Electrify Everything that Moves

- Adopt ZEV for medium and heavy duty vehicles and carve out explicit targets for trucks and bus conversion that prioritize diesel emission reduction in air pollution overburdened communities
- Mandate rapid phase in of the conversion of the state's fleet to ZEVs

Rapidly expand policies to encourage uptake of EVs – like incentives and enhancement/expansion of charging infrastructure



Hone in on Equitable VMT Reduction

- Establish a New York State-supported Equitable (Fair & Affordable) Transit-Oriented Development (E-TOD) effort via the Regional Economic Development Councils or through a New York Statewide E-TOD Program.
- Include at least 20% affordable housing minimum for all new TOD
- Amend Municipal Home Rule Law to explicitly allow fees on new development to offset public transportation service costs
- Require at least 50% of transportation sector climate monies to be spent on non-car programs

Extra Support 4 Communities Facing Barriers

- Within the Consolidated Funding Application (CFA) of the Regional Economic Development Councils, mandate prospective developers and employers to identify how their prospective projects (and related NYS funding requests) consider public transportation options for low-income workers.
- Incentivize hiring of disadvantaged workers in transit manufacturing by enabling companies to get a credit for setting aside a certain proportion of their workforce for hiring them

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EE & Housing Advisory Panel

Concerns & Suggestions

- Recognize that when DACs benefit, we all benefit and advance justice
 - We should be aggressively pursuing established State goals
 - However, New York State's own energy affordability goal of 6% or less of household income was not even acknowledged
- Emphasize Just Transition to a greater effect
 - Regulatory action and investments in efficient appliances and clean heating/cooling/cooking must be front loaded in DACs or poor and working class households will be left behind
 - Sunset dates for combustion appliances and systems are inadequate without added goals to benefit DAC, such as:
 - Investments from proposed electrification and retrofit readiness fund
 - Mandate utility planning for fossil fuel divestments and just transition investments
 - Target workforce training and job creation
 - Reduce cost burdens with adequate rate design in LMI households and historically redlined areas
 - Prioritize consumer financing options made available by CDFIs and credit unions as part of the Community Reinvestment Act regulatory compact



- Consumer protection needs are generally inadequate, therefore update the recommendations to include:
 - Utility customer bill of rights
 - Including a safety net style guarantee of renewable energy to every household
 - Public education measures to counter power of IOUs and alleviate the opaqueness of the energy system
 - Clawback provisions to defend against rate increases, gentrification, and displacement are needed as part of public subsidies to private landlords
 - Energy benchmarking/disclosure requirements that protect and empower tenants with information about the energy use intensity and affordability of their housing stock

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Energy Efficiency & Housing Advisory Panel

Undertake the following additional actions

- Create standards for upgrading existing buildings
 - Include proper cost projection and place based strategies for buildings in need of substantial repair or remediation
- Bolster local supply chains and create jobs
 - Outline plan for preservation, diversification, and growth of local supply chains and material and appliance distributors serving DACs
- Heed the special needs of and jurisdictional issues of the State's public housing stock in particular NYCHA and housing in NYC
- Tweak PSC policies to encourage EE and additional funding as part of the rate base for EE
- Calculate costs and benefits holistically
 - Consider the health impacts associated with poor indoor air quality and insufficient thermal comfort
 - Incorporate the cumulative cost burden related to housing, energy, transportation, and healthcare



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Climate Justice Working Group

Input to the NYS Climate Action Council on Power Generation Panel Recommendations

July 22, 2021



Climate Action
Council

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Overall Impressions:

Makes real progress in several key areas and yet....

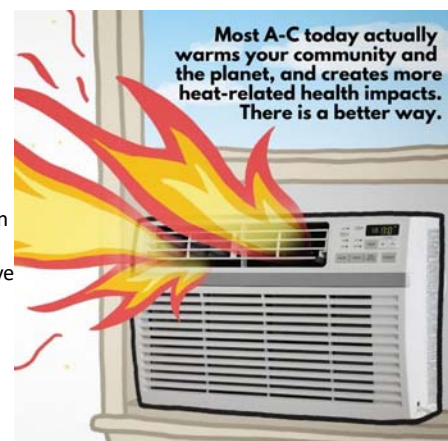
- Expansion of workforce development
- Affordability
- Community solar access
- Rapid expansion of renewable energy
- Phase out of existing fossil fuel plants

- The door to false solutions is still open
- There isn't enough emphasis on public power/energy democracy & consideration that LMI program size needs to be commensurate with need
- Cumulative impacts are not considered in the recs

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Access and Affordability for All

- Reduce the overwhelming share of household income that POC and low-income communities spend on electric power (over 6% for many)
- Prioritize modifications to NYS Home Energy Assistance Program, including:
 - Re-orient grants to only support installation of green technology
 - Help eligible households pay their bills over the hot summer months, in addition to the cost of a new AC unit
- Remove silos that agencies work in so households are aware of all programs they're eligible for. Currently, unless one agency communicates with all others, customers can be on their own to learn about programs they're eligible for like EmPower
- Direct DPS to study and consider alternative rate structures that are more progressive and to support green energy.
- PG panel guidance on 40% investment recommendation requires further input from CJWG:
 - Interagency definition of public investments is needed
 - We agree with the inclusion of transparency, accounting, and remediation efforts in the event of a failure to meet targets
- Expand existing pre-development programs for energy projects which are owned by municipalities, Indigenous tribes, CBO's, and NGOs
- Hire more EJ teams within agencies: for example, appoint an EJ lead at DPS
- Provide **SIGNIFICANT** incentives for LMI households to upgrade their appliances

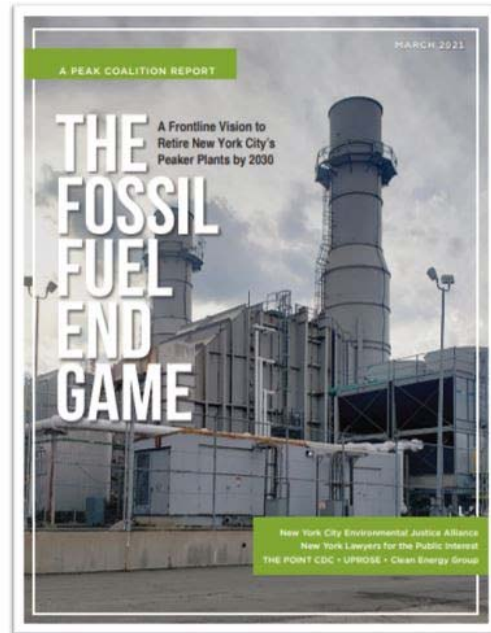


Specialists in energy equity, energy justice, energy democracy and/or environmental/climate justice need to be intentionally hired!

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Retirement of fossil fuel-fired facilities

- We support the rec. to rapidly launch an assessment and planning process to effectively and equitably reach zero emissions from power generation by 2040
- Process for the promulgation of DEC led GHG regulations for 2040 must be clear, and the end date enforceable.
- Also, make the planning process iterative so all of the utilized regulations and mechanisms are evaluated and revised as needed every 2 years in order to reach the 2040 goal
- Place moratorium on new fossil fuel plants
 - This is critical until final CAC recommendations are adopted. No new fossil fired facilities should be permitted under the moratorium absent a valid, demonstrable system reliability need that can't be reasonably met by non-polluting power.
- Address current and prospective emissions from cryptocurrency mining operations to prevent the facilities from exploiting a loophole in PSC oversight to repower fossil generating facilities behind the meter. Place a moratorium on these operations until the conclusion of a full generic EIS to determine whether these operations can be mitigated to comply with the CLCPA



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Distributed Generation/Distributed Energy Resources

We support these, and urge the prioritization of the following recommendations:

- o Compensation – Address improvements to VDER stack to more accurately reflect value provided by DERs, incorporating DEC's SCC calculation and avoided transmission costs. Introduce an EJ/DAC adder to value stack.
- o Target incentives to stimulate high value DER projects (like dual use solar/ag, multifamily housing, heat pumps/geothermal, etc. and pair them with LMI and EJ electrification goals. Expand NYSERDA's Solar Energy Equity Framework.
- o Create dynamic rate structures and programs that provide appropriate price signals and stimulate DER usage
- o Ensure a process is in place that assures LMI community solar savings don't in any way prevent access to other LMI energy savings programs like NY's Heating Assistance Program

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Questions? Email info@pushforcleanheat.org



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Reliability for the Future Grid

- Make NYISO more transparent – with more checkpoints and opportunities for public input and critiques. NYISO's needs assessment must be better disseminated and shared with local energy advocates
- Sync CLCPA Scoping Plan and mandates to the State Energy Plan
- **We support** the PG panel rec to improve reliability and resilience to climate impacts, via continued infrastructure investment (prioritize these projects in historically overburdened POC communities where access to basic amenities are less) with design criteria that can be adopted to reflect evolving climate impacts
- Invest in community outreach to provide effective communication and support for communities impacted by extreme weather events
- Address the impact of extreme heat beyond overcapacity to the grid, like increased water demand for cooling of power plant systems and sagging power lines that elevate fire risk from tree strikes



- *Storm hardening infrastructure investments must be FIRST implemented in historically burdened/black & brown communities, since they have less access to cooling for summer storms, heating for winter storms, transportation, or savings*

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Technology Solutions (only support the real ones in order to achieve justice!)

•We are concerned about the promotion of false solutions and believe that:

- The 70% clean energy by 2030 target should be achieved with existing technologies
- And the 100% by 2040 target should be achieved by focusing on developing needed solutions for dispatchable technologies
 - Certain demonstration projects distract from clear renewable energy goals – **the PG panel recommendation focused on lifecycle air quality and health impacts of unproven technologies should be pursued as a priority.**

•Fossil fuel industry supported technology fixes are based on false premises and are legally questionable under the CLCPA and often don't reduce the pollution burden in EJ communities as noted in the NY Renews False Solutions Report.

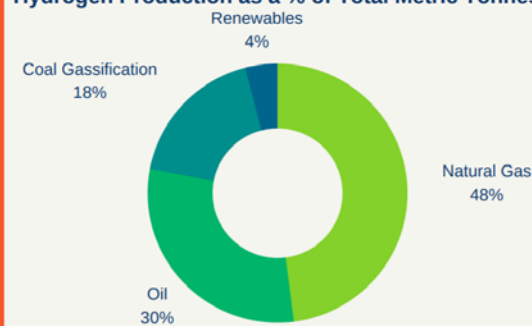
- **Fuels that are false solutions** emit as much as or more carbon than fossil fuels, create local air pollution from combustion, are not economically viable, divert land from food production and carbon sequestration, and deplete fresh water supplies.

The recommendations concerning nuclear energy must be strengthened:



- Conduct lifecycle analysis of the environmental, health, safety, emissions, and EJ impacts of this fuel
- Proactively plan for the scheduled shut down of the four reactors in upstate NY. The next two retirements will occur in 2029 unless the State shells out billions in subsidies. This includes planning for a Just Transition for impacted workers and communities.
- Account for the inflexibility of nuclear power generation as grid needs evolve when more renewable energy comes online
- The Onondaga Nation should be consulted on the nuclear waste storage and transport impacting their traditional lands.

Hydrogen Production as a % of Total Metric Tonnes



- Hydrogen may have a valuable role to play in the deep decarbonization of heavy transport and industrial processes, but runaway plans for its extensive use in the power sector raise grave concerns. It has a significant water footprint and its combustion in power plants produces nitrogen oxide emissions up to six times greater than methane. NYPA already embarking on a hydrogen combustion demonstration project despite these concerns is a red flag

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Workforce Development

We support the recommendations to provide education and career opportunities in clean energy for DACs and fossil fuel sector employees

•DACs, workers, MWBEs need state agencies involved in any aspect of large- or small-scale clean energy projects to fully leverage their capacity to lock in enforceable commitments around access to quality jobs and ensure public investments in workforce development generate the desired ROI



- Fully leverage tools like community workforce agreements, community benefit agreements, first source hiring, and project labor agreements to increase access to construction and permanent jobs for DAC members; Develop agreements in partnership with frontline communities, industry, and organized labor
- Further emphasize green worker-owned cooperatives that can be hired for public & private projects and economic ownership of local clean energy projects to prevent displacement during 'revitalization' projects

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Energy Delivery & Hosting Capacity

We support this series of recommendations as they're key to building out renewables. **Some concrete actions we'd add:**

- Pro-actively identify key transmission and distribution upgrades, improvements, and new line construction needed to deliver renewable energy across the state and maximize the retirement of fossil fired resources
- Approach interconnection with an intelligent, justice oriented lens:
 - Adopt PSC regulations to allow for advanced metering to enable cost effective and time efficient solar interconnection options
 - Work with CBO's to tailor regulatory changes in favor of community led clean energy projects and ensure they are sufficiently resourced to engage
 - Subsidize community led solar projects for customer side upgrades and equipment and exempt them from all utility side interconnection costs
 - Subsidize offshore wind interconnection upgrades, as placing the cost burden entirely on the industry may delay CLCPA mandated deployment targets
 - Study grid vulnerabilities in DACs and prioritize improvements in those areas

FACT SHEET
OFFSHORE WIND IN NEW YORK STATE



Offshore Wind is Ready to Power New York



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Growth of Large-Scale Renewable Energy Generation, Siting, and Community Acceptance

We suggest the following actions:

- Balance approach of large-scale renewables with significant investment and technical support for DACs to develop behind the meter microgrids
- Launch statewide public education campaign to inform New Yorkers about the climate crisis and benefits of shifting to a clean economy.



• **We support** the recommendations to:

- Incentivize local climate resilience HUBs
- Fund non-profits and CBOs to conduct community outreach
- Expand and streamline customer incentives for EE, including funding for customers based on utility payment history instead of credit scores
- Ensure community benefits and avoided costs are tracked in dollar amounts, and the value of the cumulative health benefits of clean power is quantified

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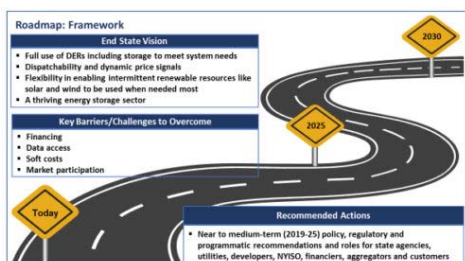
Existing Storage Technology

We support:

- Updating the State's energy storage roadmap, as soon as practicable, to update and revise storage deployment goals recognizing the substantially higher requirements identified in the power grid study of 15GW by 2030
 - a) The recommendation to provide increased funding for energy storage deployment
 - b) The recommendation to initiate a new docket, ideally before year end 2021, that establishes new mandated yearly energy storage targets increasing to an overall statewide storage target of 15GW by 2030, and mandates funding and financing mechanisms similar to the clean energy standard for storage.



Storage to protect DACs where the resilience need is much higher should be prioritized!



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Gas Infrastructure, Transmission, & Methane Leakage

Phase Out Natural Gas

- **The transition away from gas infrastructure is a strong recommendation by the PG panel!** It should include a detailed analysis on the cost effective and equitable strategy necessary for this transition to be just.
- The recommended proceeding on GHG reductions for gas utilities concerning transmission and allocation of timelines should prioritize progress in areas in EJ communities where co-pollutants pose a high cumulative burden
- Scrutinize the legitimacy of the concern that phasing out gas infrastructure poses grid reliability risks, as the notion unnecessarily conflicts with achieving crucial short term, foundational emission reductions. Continuing to build out infrastructure on the unfounded premise of reliability makes zero technical and economic sense. It's not necessary and becomes a stranded asset. We must **Ask who pays for this and benefits from it?**
- Clarify what the recommendation on supporting DEC efforts means- If this refers to existing processes, that should be explicit, and expressed as a recommendation
- The Abandoned Wells approach should be more thoughtful.
 - Public funds should be used as a last resort to cap wells as it drains resources from investments that could made in transitioning DACs to clean energy
 - Consider ways the oil and gas industry can 'adopt a well' in their service territory or otherwise contribute to reducing emissions from the sources.



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Climate Justice Working Group

Input to the NYS Climate Action Council on Land Use and Local Government and Agriculture & Forestry Panel Recommendations

September 13, 2021



Climate Action Council

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Overall Impression of Land Use and Local Government Recs – We support with small room for improvements

Adaption & Resilience

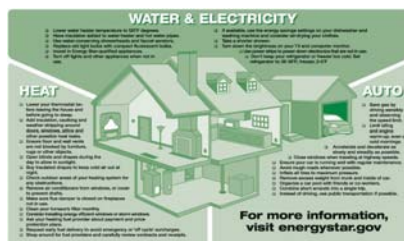


- Creation of State Resilience Officer position should incorporate Just Transitions principles and be a DAC supported appointment
- Provide clarity on the positioning of the Adaptation & Resilience Sub-Cabinet position
- Resilient infrastructure fund needs to prioritize frontline communities
- Pro-actively mitigate adverse impacts in DACS from proposed:
 - Insurance premium surcharges
 - Strategies to address underinsurance
 - Managed retreats and buyouts of properties
- Make online tools that support vulnerability assessments available in multiple languages

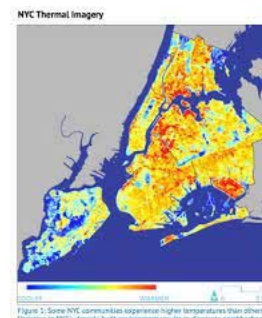
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Adaptation & Resilience continued..

- Maintain ongoing analysis of health implications of new climate projections on heat increases
- Incorporate air quality into heat warning systems
- Update DOS Costal Management Program to require diesel emission reductions from land and water based vehicles



- Enhance and leverage the NYS WAP to better protect inhabitants from extreme weather



- Directly fund efforts to build and maintain nature based infrastructure and natural areas
- Along with including EV charging as part of resilience plans, add an overall response that prepares communities for evacuation needs, and values solar + storage and V2G benefits

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Make 'Smart Growth' truly intelligent and equitable!

- Adopt flexible definition of smart growth to include various mixed used developments
- Acknowledge difference in rural, urban, and suburban areas
- Make concentrated effort to avoid burdening DACs in the prioritization of conservation areas and degrowth of high climate risk and ecologically sensitive areas



- Meaningfully engage communities in the planning and implementation of projects. Consider creating a 'Climate Justice through Community Planning and Action' grant program to fund local capacity building in DACs for project planning and review processes



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Smart Growth continued...



- Ensure there is an 'E' before T-O-D to avoid gentrification/displacement!
- Prioritize investments in high density, transit underserved and high pollution burden areas

Let's avoid this! >>>>



- Promote open spaces and recreation, not just TOD in new commercial/residential development

- Establish a clear definition of GEIS to ensure it doesn't obviate municipal land review requirements
- Reform REDCS to include diverse DAC representation
- Adopt explicit land use strategies to reduce GHGs and co-pollutants in DACs



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Clean Energy – *By and large, we support the recommendations in this section. It's important to note that:*

- Technical support to local governments would allow these often understaffed entities to take better advantage of opportunities
- Projects that recover methane from wastewater treatment facilities should be onsite only and not be used to justify pipeline expansion
- Develop a statewide dashboard of community greenhouse gas emissions inventories
- We are enthusiastic about plans to decrease waste and increase recycling and electrify municipal and school district fleet but encourage the State to be thoughtful in how DAC's are defined to qualify for TVIP funds to ensure equitable participation
- NYPA should play a larger role in working with municipalities to support renewables deployment
- On Community Choice Aggregation explicit focus must be on removing barriers to entry and safeguards for households in DACs



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Carbon Sequestration through conservation

DAC benefits must be prioritized in investments to restore and protect aquatic habitats, including in the Environmental Bond Act and Environmental Protection Fund, DEC Water Quality Improvement Program and NYS Conservation Partnership



Avoided land conversion is crucial for carbon sequestration, VMT reduction, enhanced farms, and food security

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Overall Impression of Ag & Forestry panel recommendations:

Unfortunately, they are insufficient to the task:

- A 30% GHG reduction target is inadequate when the CLCPA requires elimination of all anthropogenic emissions (except from livestock sources)
- Doesn't totally address systemic racism
- Still enables harmful, large scale farm operations
- Relies on false solutions like biogas and biomass
- Maintains use of fracked gas in fertilizers
- Fails to spur robust organic farming
- Too many voluntary incentives and not enough mandatory actions



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Take a holistic approach that not only reduces GHGs, but improves crop yields and protects drinking water!

We can do it! Examples:

A recent Genesee Valley of NY study proved the numerous benefits of better soil management and use of strip-till, cover crops, and nutrient management



- Grants offered by the Watershed Agricultural Council and NYC enhance drinking water and climate mitigation and resilience!
- The NYS Legislature just enacted the Soil Health and Climate Resiliency Act (S4722A/A5386A). The CAC must see to it that NYS vigorously implements it!



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CAC should incorporate climate justice principles to ensure that:



- BIPOC farmers are able to participate throughout the process including design and implementation
- Policies designed to lower GHGs don't increase - and in fact decrease - the use of harmful toxic pesticides
- Disproportionate barriers for small to mid-size farms and for social disadvantaged farmers aren't created

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A 30% net GHG cut from present day levels by 2050 is inadequate. CAC should pursue more ambition and steps like:

- Adopt the climate goals set in the federal Agriculture Resilience Act – which requires cutting GHGs in half from 2010 levels by 2030 and to net zero by 2040
- Reform method of distributing State funds to NY farms to make it equitable, rather than disproportionately benefiting GHG intensive operations like large scale dairy farms
- Make the Transition Just for workers! – Include safeguards to enable equitable workforce training and compensation



- Impose a fee on fertilizers that funds a transition to organic farming. This would meaningfully reduce GHGs and protect precious public waterways and private water wells from runoff

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CAC should adopt real and not false farm energy solutions:

- Do not utilize biomass

- Like biofuels, burning trees isn't a smart solution



- Create a pathway for 100% zero emissions farm vehicles and equipment

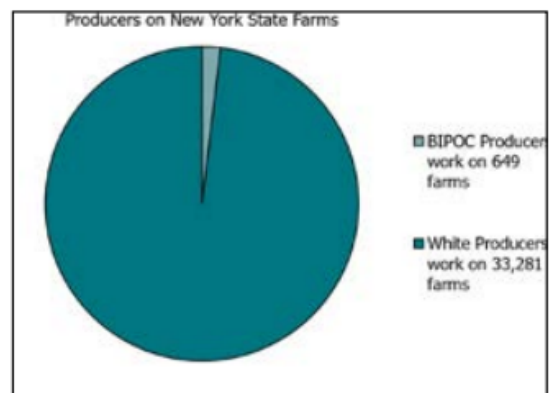
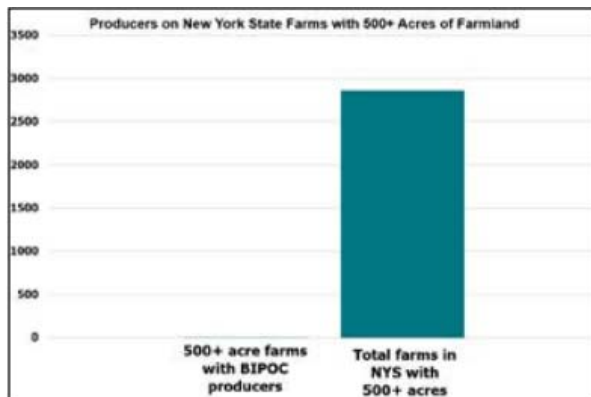
- Do not support the installation of biodigesters at CAFO's – these are inherently unsustainable!



- Fund transformative practices upstream of manure storage and towards practices that smaller producers can adopt

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Uproot systemic racism in NYS farming!



- Meaningfully involve BIPOC farmers in the creation of incentive programs – consider setting up an Advisory Board that would make recommendations on program design
- Offer incentives in the form of grants instead of loans and eliminate the match requirements for grants

Graph Sources: Diversity and Racial Equity Working Group Report NYAGM

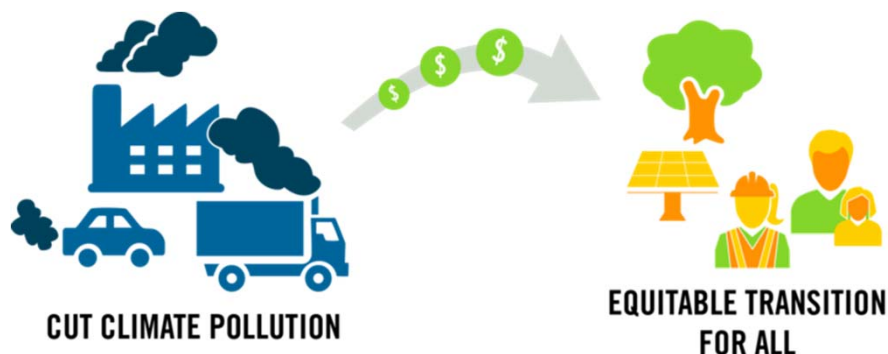
- Support community gardens and protect them from development
- Provide land to BIPOC farmers and farmer workers that have been historically excluded from farming opportunities

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Climate Justice Working Group Feedback Waste and Energy-Intensive & Trade-Exposed Industries Advisory Panels Just Transition Working Group

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CJWG perspectives on Just Transition, EITE, and Waste



October 1, 2021



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Just Transition



- Clarify definition of 'low carbon energy' manufacturing
 - Require a 'best in class' framework when public subsidies are allocated to manufacturers to encourage high road performers
- The Enabling Initiatives are generally strong and commendable
 - Add a Workforce Assessment Plan to ensure impacted workers can contribute to the process of protecting workers and include retirement planning, allowing aging fossil workers a dignified retirement

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Just Transition



- Consider Community Benefits Agreements between manufacturers, union groups, and impacted communities
 - Make these legally binding
- Minimize disruptions in the transition of the existing workforce by including plans to reuse shuttered dirty power plants for clean energy and sustainable manufacturing
- Focus on eliminating implicit bias in searching/hiring for workers

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EITE



We support the emphasis on:

- Green job creation for members of DACs
- Data collection and reporting requirements to paint an accurate picture of how industrial facilities impact DACs
- State procurement of low-carbon materials

But, we suggest:

- Making climate and EJ the explicit objective, as opposed to business development
- Strongly emphasizing demand-side changes to reduce materials waste
- Prioritizing electrification for industrial heat whenever feasible
- Ensure the BIPOC are included in the process of creating workforce development programs, to ensure that their unique perspectives are represented

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Justly reduce EITE industry footprints

→ Carbon capture and storage is not a clean resource

→ 'Green H2' can be a suitable alternative fuel in high heat industrial processes but DEC should be ready to use its power under Section 7 of the CLCPA to prohibit actions that add to pollution burdens in DACs, i.e. avoid harmful emission releases from combustion, such as NOx

→ Offset projects should deliver meaningful local environmental benefits that negate the source impacts



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Waste



- > Industry flexed significant power over panel recommendations:
 - Ideas pertaining to rethinking and redesigning waste systems were omitted, like:
 - Barring incineration
 - Taxing overproduction of food
 - Mandating sustainable shipping/packaging and pet litter bags
 - Creating polluter funded union jobs for cleanup of waterways, oceans, sewage, soils, air
 - The overall lack of emphasis on waste reduction and local scale diversion practices was staggering

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Waste



- > DEC overemphasized incremental, underwhelming actions like creating landfill and biogas markets (despite their questionable air and climate benefits) and recycling as opposed to reducing/rethinking
- > Industry influence perpetuated practices, like the lack of regulations on waste trucking and the overproduction of materials
- > The process by which the panel recommendations were finalized lacked opaqueness
- > As revealed by the integration analysis, greater ambition in reducing emissions from waste is necessary

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