

600 NE Grand Ave. Portland, OR 97232-2736

MINUTES OF THE METRO SOLID WASTE AND RECYCLING COMMITTEE (SWAC) MEETING

Metro Regional Center, Council Chambers Thursday, June 28, 2007

Members / Alternates Present:

Councilor Kathryn Harrington	Dean Kampfer	Dave Garten
Mike Hoglund	Audrey O'Brien	JoAnn Herrigel
Glenn Zimmerman	Dave White	Mike Leichner
John Lucini	Anita Largent	Matt Korot
Jeff Murray	Bruce Walker	Theresa Koppang
Paul Edwards	Susan Ziolko	Tom Badrick

Guests and Metro staff:

Wendy Fisher Heidi Rahn Janet Matthews **Easton Cross** Steve Apotheker Tom Chaimov Segeni Mungai Cyd Cannizzaro Michelle Bellia Jeff Gage Lee Barrett Marta McGuire Bill Metzler Jim Watkins Julie Cash Kevin Six Matt Tracy Gina Cubbon

I. Call to Order and Announcements.......Councilor Kathryn Harrington

- Councilor Harrington opened the meeting at 10:05 a.m. As attendees introduced themselves, the City of Portland's Bruce Walker announced that the draft "Portland Recycles" plan, has so far had the following responses from the public: 80% strongly support the idea of roll carts, 68% support adding food waste, and 58% support semi-weekly garbage collection (when food waste is added to curbside pickup). Waste Management's Dean Kampfer added that the City of Gresham will roll out carts beginning September 1.
- Approval of minutes: Dave White of the Oregon Refuse & Recycling Association objected that his comments regarding the proposed business recycling program were not noted. Janet Matthews and Councilor Harrington explained that the Agency is transitioning to less detailed meeting summaries. Regardless, Mr. White asked that the minutes be amended to include his comment that the business community should be included in the discussion. Mr. Kampfer had a similar issue with the minutes, saying that the reason for the technical meeting regarding the program should have been included.

With those amendments, the minutes were unanimously approved.

II. Council Update

Councilor Harrington introduced this new agenda item, which will be a standard part of future SWAC meetings. At the June 21st Council meeting, extensive public testimony was given regarding the Enhanced Dry Waste Recovery Program (EDWRP). Council decided to delay taking action while the comments are taken into consideration; the program will come before Council again on July 12. Council is very anxious to move forward with the program.

- A white paper has been written by consultants from CH2M Hill regarding the upcoming Waste Transport Contract. Council has approved writing a draft RFP, which will be released for public comment. In addition to overall cost, consideration will be given to community impacts, fuel consumption, and air quality as well as other environmental factors.
- Steve Apotheker of the Waste Reduction & Outreach Division was named Recycler of the Year at the annual AOR (Association of Oregon Recyclers) conference in late June.. Mr. Apotheker was also given a Sustainability Award by Metro recently.
- Community Relations Supervisor Jan O'Dell is leaving Metro to form her own public relations consulting firm.

IV. Options for Increasing Business Recycling.......Marta McGuire, Heidi Rahn

Councilor Harrington introduced this agenda item, part three of a series of presentations regarding a new Business Recycling Program. Members were asked to be ready to vote for a recommendation at the conclusion of this piece. MPAC is also being asked for their input because of the program's potential effect on communities.

Marta McGuire recapped the proposed program options:

Option 1: Metro passes mandatory business recycling (as recommended by the Contingency Plan Work Group), including more education, separation of paper and containers, and random inspections.

Option 2: Metro requests EQC action on mandatory recycling. Metro may petition the EQC to determine whether mandatory business recycling should be ordered in the region.

Option 3: Metro establishes Business Recycling Standards. A standard of business paper and container recycling would be established, with baseline evaluation data used to determine additional recovery needed by each jurisdiction. Local governments would submit plans for increased recovery efforts.

As a result of the technical meeting June 13, participation and capture numbers were recalculated and increased, system costs were adjusted (including lower material sales price), and other cost systems are being reviewed.

Councilor Harrington reminded the group that "status quo" was not one of the options. Comments during the ensuing discussion included:

- The City of Beaverton has been as successful as the City of Portland, but without mandated recycling. Engage businesses in the process, as Beaverton has. Some of Beaverton's success is because businesses are visited repeatedly, not just once or twice.
- If Metro mandated the program, it would take a lot of pressure off the local jurisdictions.
- Conversely, mandating could paint a negative picture of Metro, and 2 FTE seems too little to successfully enforce the program. Having to go to individual councils, such as Washington County, and write / adopt legislation would be almost impossible.
- Each jurisdiction will have to come up with extra funding; \$100,000 split between them all is inadequate.
- Where resources are used makes a huge difference. If the program is mandated, don't consider it a failure to not capture all 80,000 additional tons.
- The discussion is really one of whether to mandate now, or in a couple of years. It's likely inevitable.

Bruce Walker of the City of Portland moved to recommend Option 1, a mandatory program. The City of Milwaukie's JoAnn Herrigel seconded the motion. In discussion, citizen representative Dave Garten said that he is unconvinced that making a program mandatory assures its success. Waste Management's Dean Kampfer said he would abstain from the vote because his company will support whatever option their local jurisdictions choose. **Vote**: 2 yes, 9 opposed, 2 abstentions

Ms. Herrigel then moved to pursue Option 3, and after results of a two-year period are known, if the goals have not been met the mandatory program would be revisited. Legacy Health System's Tom Badrick seconded the motion. **Vote**: 11 yes, 1 opposed, 2 abstentions.

Mr. Walker stressed that more funding from Metro will be needed for the program to succeed. He moved that with SWAC's adoption of Option 3, significant additional funding be provided to increase education and outreach. **Vote**: 14 yes.

Councilor Harrington thanked the Committee for its "fruitful discussion" and for coming up with a strong recommendation. She will carry the vote and the message about funding to the full Council. (PowerPoint presentation and agenda item handouts attached.)

V. Other Business and Adjourn.......Councilor Harrington

Because of a possible conflict with the standard 10 a.m. start time for the July 26 SWAC meeting, the Councilor asked if members could instead meet at 8 a.m. if needed. The Committee agreed.

Councilor Harrington adjourned the meeting at 11:51 a.m..

Prepared by:

Gina Cubbon Administrative Secretary Metro Solid Waste & Recycling Department

gbc

Attachments: Increased Business Recycling presentation and handouts M:\rem\od\projects\SWAC\Agenda_Minutes\2007\SWAC062807min.doc

June 17, 2007

Recycle at Work Regional 2007-2008 Marketing Plan

PROGRAM OBJECTIVES

The regional business waste reduction work plan addresses the following objectives:

- 1. Provide businesses with annual education and technical assistance programs focused on waste reduction and sustainable practices.
- 2. Develop information and resource materials that demonstrate the benefits of waste reduction and sustainable practices to support the business assistance program.
- 3. Conduct annual regional outreach campaigns to increase participation in the business assistance program and to promote recycling opportunities and other sustainable practices.
- 4. Implement waste reduction and sustainable practices at government facilities.
- 5. Identify and implement opportunities for increasing recovery in the business sector, including service provision options, incentives for recycling and regulation.
- 6. Periodically review end-use markets to assess cost effectiveness, material quality and capacity.

MARKETING GOALS

- 1. Technical Assistance Services: Increase number of businesses assisted by 15% (from 1100 in 05-06 to 1265).
- 2. Brand-building effectiveness: Increase Recycle at Work brand awareness from 30% to 50% and maintain high levels of customer satisfaction (73% highly satisfied, 18% satisfied).
- 3. Material Recovery: Increase paper and container recycling by businesses in the region.

TARGET AUDIENCES

Businesses that generate recyclable paper and containers in the tri-county region must recycle an additional 125,000 tons by 2009 in order to meet the regions recovery goal of 64%. Target audiences most frequently identified in local jurisdiction outreach plans include:

- The **professional services sector**, including architects, real estate, legal, financial services, and engineering, are large paper generators.
- Multi-tenant property managers oversee waste sorting and collection for buildings throughout the Metro region.
- Universities and institutions generate large amounts of paper and many are assessing the sustainability of their practices.
- Regional businesses have facilities in more than one jurisdiction and have the opportunity to streamline waste reduction efforts.
- Businesses without recycling services or deskside collection containers for all employees, including new businesses and those experiencing service changes, could increase participation and capture rates throughout the region.
- These businesses are all serviced by **waste haulers** and **private recyclers** who provide varied levels of service and assistance. Twenty-nine percent of businesses claim that their recycling assistance comes from their hauler.

STRATEGIES

Strategies to achieve our goals and reach our target audience have been developed in conjunction with local governments and their outreach plans. These strategies provide direction to move the regional Recycle at Work efforts forward in an efficient and focused manner.

1. Provide businesses with resources that address specific barriers to recycling.

Perceived barriers to recycling by the business community include:

- Time
- Cost
- Convenience
- Lack of knowledge
- Stakeholder communication
- Space
- Corporate norms and policies

To address these barriers, the Recycle at Work program provides the following resources:

- On-site waste reduction technical assistance catered to the specific business' needs.
- Assistance in understanding the garbage and recycling bill, services available, and how to communicate with the hauler.
- Deskside and central area recycling collection containers to provide convenient access for all employees.
- Employee training, signage, and prompts to improve recycling knowledge and reminders.
- Communication assistance with haulers, janitorial staff, property managers, and decisionmakers
- Tools to assist with waste reduction and sustainable purchasing efforts.
- On-going accessibility to a recycling specialist.

The Recycle at Work program plans to improve efficiencies in resource development and distribution throughout the region. Many local jurisdictions are creating resources that could be applicable to the resource needs of other jurisdictions. By streamlining resource needs and development across jurisdictions, we are allowing more time to provide direct business assistance.

Metro will continue to distribute the following outreach resources to local jurisdictions in 2007-2008:

- Deskside and central collection containers
- Recycle at Work poster/brochures
- EcoFact sheets
- Commingled box stickers
- Buyer's Guide to Recycled Products web site and business cards
- Recycle at Work web site
- Recycle at Work display screens
- Business list
- Database to track marketing, assistance, and improvements
- Recycled content paper reams
- Solid Waste Assessment Team waste sorts

New materials to be created by Metro, in conjunction with the Business Recovery Work Group, for use by all jurisdictions include:

- Recycle at Work brochure
- Updated EcoFact Sheets
- Electronic waste disposal options and purchasing fact sheet
- Solid Waste Assessment Team promotional hand out
- Business analysis/recommendations template
- Case Study template

Materials created by local jurisdictions that could be shared or modified for use by other jurisdictions include:

- Recycle at Work brochure/menu of services (Portland)
- Recycling posters (Portland, Washington Co.)
- Graphics of recyclable materials (Portland)
- Industry-specific inserts (Portland)
- Toolkit for Master Recyclers (Portland)
- Do-it-yourself tools (fact sheets, assessment tool, waste sort kit) (Portland)
- Newsletter/commercial mailer content (All)
- Recognition event ideas (Portland, Washington Co., Gresham)
- Web content (All)
- Presentations for businesses or trade organizations (All)
- Model designs for recycling enclosures (Clackamas, Portland)
- Fact sheets purchasing policy, green teams, etc. (Portland)
- Outreach letters for target sectors (Portland)

2. Extend the Recycle at Work brand via local publications, resources, and business initiatives.

The Recycle at Work program is branded for our knowledgeable, professional, and friendly waste reduction technical assistance services to businesses. These attributes are the key drivers of our service and must be delivered at every touchpoint with our customers. The brand identity was defined during the 2006-2007 Recycle at Work outreach campaign. However, the Recycle at Work name, logo, tagline, and colors are not used consistently by all jurisdictions providing these services. The Business Recovery Work Group is focusing on regional collaboration, partnerships, and economies of scale in our services, thus proper and consistent use of the brand is necessary. The following activities will be implemented to extend the brand identity to all Recycle at Work service providers:

- Use of Recycle at Work name, logo, tagline and colors should follow the brand identify guidelines in all materials distributed.
- Taglines may differ for each jurisdiction by listing the jurisdiction name or recycling cooperative name after Metro's name.
- All references to Recycle at Work must recognize the partnership with Metro.
- All jurisdictions must have access to Recycle at Work branding graphics applicable to the various programming and design tools used.
- When Recycle at Work is not the primary name of a local program, the local materials and outreach tools must reference the partnership with Metro and the Recycle at Work program.

3. Distribute deskside recycling boxes to specific geographic segments.

Research shows that the presence of deskside recycling boxes increases recycling performance. Not all businesses are aware of the free box delivery services available via the Recycle at Work program, nor are they all interested in spending time to work with a recycling specialist. To ensure that all businesses in the Metro region have the opportunity to increase their recycling performance in the short-term, a mass distribution of boxes must take place. Focus should be on geographical areas that have not been touched via targeted assistance or have had recent service level changes in their recycling programs. During the box distribution campaign, the delivery person will provide information highlighting Recycle at Work services available for further assistance. A brief survey may also be conducted to verify regional recycling participation rates as self-identified by businesses in the February 2007 survey.

The box delivery campaign could take place in conjunction with the annual Recycle at Work outreach campaign, or just prior to the campaign as the findings could be used to identify geographic and industry segments that are strong targets for further outreach.

4. Conduct targeted outreach campaign with advertising and earned media.

Successful marketing combines several elements. CBSM, for example, works most effectively when combined with media advertising and earned media. According to some research, "Media make ideal partners on social issues, since they normally see it as their mission to improve their community. Earned media (publicity versus paid advertising) is usually valued at 3.5 times the value of advertising of the same broadcast duration or print column inches, due to perceived credibility with the audience." Advertising and earned media outreach will focus on publications, electronic media, and other methods that reach target audiences and market areas to promote Recycle at Work resources and convey key messages about recycling.

Key messages should focus on improving paper and container recycling in the region. Ninety-seven percent of businesses in the region report that they are recycling, yet waste composition studies show that over 25% of the recyclable paper and containers generated by businesses is being thrown away.

Target sectors for future outreach include large paper generators and businesses in geographical areas that have not had extensive outreach or assistance recently. A focused target sector, diverse media mix and local community campaign will be considered. The campaign goals will be further defined as the Business Recovery Work Group has the opportunity to assess the results of the 2007 business survey and box distribution campaign, as well as identify new strategies being implemented to increase recovery by various jurisdictions.

An evaluation of campaign effectiveness will be conducted to assess the impact of strategies utilized and sectors targeted.

5. Provide thorough and coordinated assistance to 10 regional businesses.

A targeted and coordinated regional outreach effort to businesses that have facilities in various jurisdictions will provide efficiencies in service offerings and a more cohesive roll out of a new

program for the business. Businesses that are currently being assisted and will continue to require regional coordination as they implement change include:

- Fred Meyer's
- Home Depot
- Starbucks
- RiteAid
- The Holland Inc.
- Providence Hospitals
- New Seasons
- Umpqua Bank

The Business Recovery Work Group will identify additional businesses using the following criteria: large paper generators, over 500 employees, can leverage recycling specialist sector awareness of sector, corporate support for change, and have the opportunity to increase recovery throughout the region. Based on the results of the regional efforts, the Group will be able to identify specific sectors or businesses that could greatly benefit from future coordinated assistance. Potential candidates include box stores (e.g. WalMart), hospitals, and restaurants.

A regional outreach and assistance guidance document has been created and identifies roles and responsibilities of various stakeholders. A template for analysis and recommendations will also be provided to streamline the level of effort required by the lead recycling specialist. The Recycle at Work web collaboration site provides the means to communicate with all team members and track research and performance. Successful regional business efforts will be pitched to the media and described in a case study to recognize the business.

6. Utilize and refine the program's value network and marketing/distribution channels.

A value network is a system of partnerships and alliances that the program creates to source, augment, and deliver its offerings. Marketing channels are sets of interdependent organizations involved in the process of making a service available for use. Partnerships and marketing channels for the Recycle at Work program include:

- Building Owners and Managers Association members manage over 29 million square feet of office space in the Metro region. Membership includes active participation in trade shows, a golf tournament, education committee, box lunches, event sponsorship, and member breakfasts.
- Chambers of Commerce memberships include frequent meeting attendance, co-sponsorship event opportunities, newsletter articles, testimonials, and service offerings introduced by executive directors.
- Trade organization local jurisdiction members will represent the regional program when membership is cross-jurisdictional.
- Commercial waste haulers and private recyclers will be approached to partner with Recycle at Work staff to identify methods of streamlining technical assistance references and increasing recovery.
- Business licensing departments at local governments will share Recycle at Work information with business license applicants.
- Sustainability-focused groups provide advertising, event collaboration, and partnership opportunities.

- Suppliers should commit to a site assessment and improving their waste reduction practices as part of our purchasing relationship.
- Business customers or award recipients can offer testimonials and partnership/advertising opportunities that benefit both partners.
- Government touchpoints with businesses will be leveraged via informed staff, promotional materials, event collaboration, and purchasing guidelines.

SCHEDULE

July – August 2007

- Buyer's Guide update
- EcoFact sheets content update
- SWAT brochure design
- Regional business analysis report template
- Business list distribution
- Database design
- Box order
- Brand extension to local materials/communications
- BOMA golf tournament
- Regional business assistance
- Chamber of Commerce meetings

September – December 2007

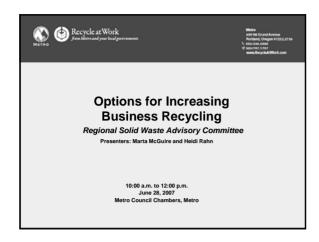
- Campaign planning and collateral development
- EcoFact sheets & SWAT brochure
- Recycle at Work brochure
- Case study template
- Database design and creation
- Business recycling survey (verification of 2007 results)
- Box distribution campaign
- Box order
- Brand extension to local materials/communications
- BOMA Recycle at Work lunch workshop
- BOMA trade show
- Regional business assistance
- Chamber of Commerce meetings
- Hauler and private recycler awareness of program and staff

January – March 2008

- Campaign implementation
- Box order
- Chamber of Commerce meetings
- Distribute collateral to business licensing departments for distribution

April – June 2008

- Campaign evaluation
- Box order
- Chamber of Commerce meetings

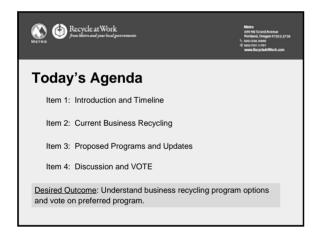


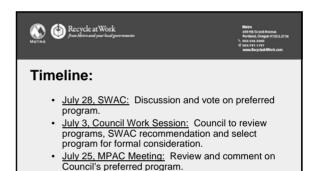


Today's Desired Outcome:

· Recommendation to Metro Council on preferred option to increase business recycling.

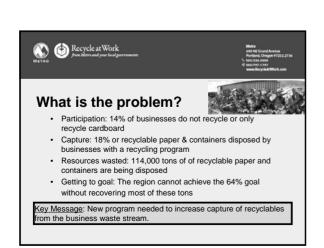
Option #1: Metro-Passed Mandatory Business Recycling Program Option #2: Request Environmental Quality Commission Action Option #3: Locally- targeted Business Recycling Standards





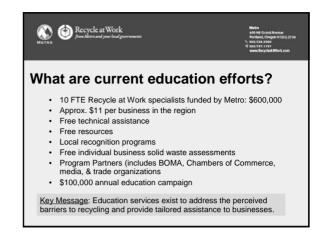
• Sept/October: SWAC, MPAC, and Metro Council

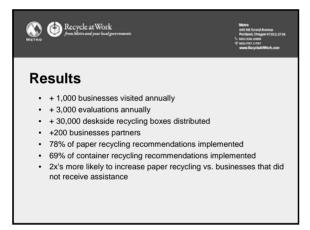
review of draft ordinance.

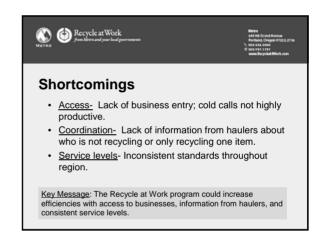


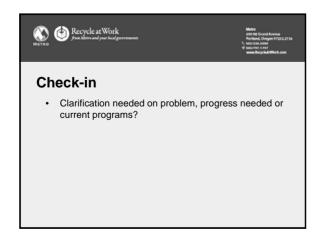


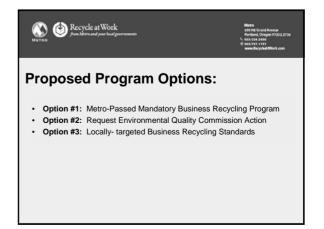


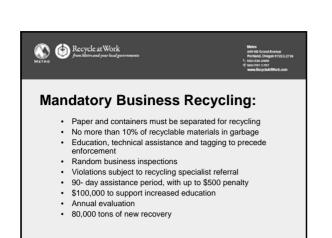


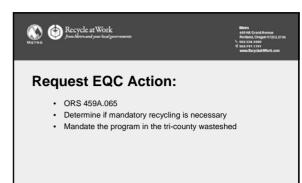






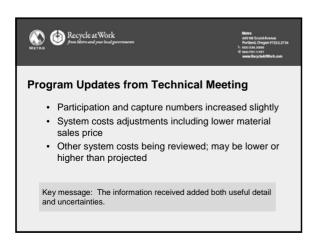


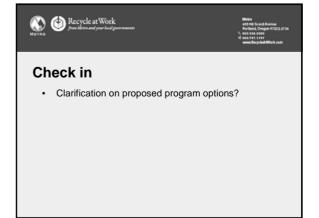




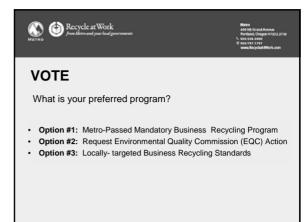


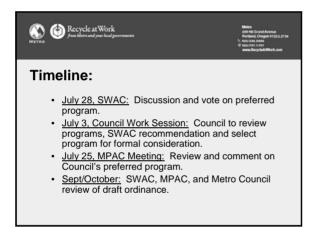
Barriers to Recycling and Current Program Shortcomings	Strategies to Overcome
Time to set up and implement	Current program: Recycle at Work services
Lack of knowledge	Current program: Recycle at Work services
Convenience and space	Current program: Recycle at Work services
Cost	Current program: Recycle at Work services
Corporate resistance	New program: Mandatory Recycling
Capture (non-participating or underperforming businesses)	New programs: Mandatory Recycling or Business Standards programs
Access (for recycling specialists)	New program: Mandatory Recycling
Coordination (information from haulers about who is not recycling)	New program: Mandatory Recycling Business Standards programs
Service levels (inconsistent standards throughout region)	New program: Business Standards and Mandatory Recycling programs

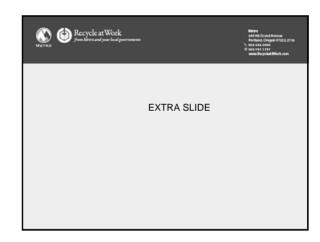




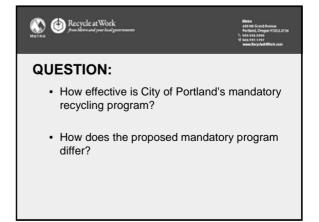


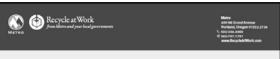












City of Portland Requirements

- · Adopted in 1996
- Targets businesses, multifamily and construction projects
- Must recycle at least 50 percent of waste
- 30-day assistance period with \$500 penalty for noncompliance
- <.25 enforcement FTE, proposed new plan increase to 1.0 FTE
- 2 penalties to date

Program Comparison		
City of Portland Mandatory Recycling	Region-wide Mandatory	
•Targets businesses, multi-family and construction	•Targets commercial businesses and institutions	
•Must recycle 50 percent of waste	•Must recycle paper and containers. No more than 10 percent allowed in trash.	
•Emphasis on education and promoting Recycle at Work service	•Emphasis on education and promoting Recycle at Work service	
•30-day assistance period with \$500 penalty	•90-day assistance period with up to \$500 penalty	
•Less than .25 Enforcement FTE	•2.0 Enforcement FTE	

Option #1: Metro-passed Mandatory Recycling		
Roles	Responsibilities	
Metro	Adopt requirements, coordinate and evaluate program and education campaigns, conduct enforcement, and distribute funds.	
Local governments	Adopt requirements, serve in regional work group, assist with outreach campaigns and collaborate on the Recycle at Work program.	
Haulers	Assist with customer education, accommodate customers with increased recycling and reduced garbage collection service.	
Businesses	Adopt or improve workplace recycling program and educate employees.	

Option #3: 90% Business Recycling Standards		
Roles	Responsibilities	
Metro	Adopt recycling rate standard, review and approval local programs, distribute funds, and conduct evaluation.	
Local governments	Develop, implement and manage local programs, submit annual report and revise program as needed and participate in regional work group.	
Haulers	Assist with customer education, accommodate customers with increased recycling and reduced garbage collection service	
Businesses	Adopt or improve workplace recycling program and educate employees.	

Options for Increasing Business Recycling June 2007

Table 1. Program Components

	Program Options 1 and 2: Mandatory Recycling	Program Option 3: Business Recycling Standard
Program Goal	Achieve 90% recycling rate for paper and containers to recover an additional 80,000 tons.	Achieve 90% recycling rate for paper and containers to recover an additional 80,000 tons.
Target Generators	Small, medium and large businesses, institutions and public agencies. (Approximately 56,000 businesses in the region fall into this category.)	Small, medium and large businesses, institutions and public agencies. (Approximately 56,000 businesses in the region fall into this category.)
Target Materials	Cardboard, paper and mixed containers (glass, plastic bottles and steel and aluminum cans).	Cardboard, paper and mixed containers (glass, plastic bottles and steel and aluminum cans).
Main Program Components	 Require businesses to separate paper and containers for recycling. No more than 10% of recyclable materials in garbage. Education, technical assistance and tagging to precede enforcement. Random business inspections to determine compliance. Violations subject to recycling specialist referral. 90-day assistance period, with up to \$500 penalty \$100,000 to support increased education and expand Recycle at Work program. Requirements take effect July 1, 2008 Annual evaluation. 	 90 percent recycling target set for business paper and container recycling, applicable to the region's jurisdictions. Baseline evaluation data to determine additional recovery needed by jurisdiction. Metro provides list of Best Management Practices to local governments. Local governments submit program plans for increased efforts and annual reports on progress. \$100,000 to support new or enhanced programs. New programs begin January 1, 2008 Annual evaluation. Formal reporting to SWAC, MPAC and Metro Council after second year for local governments that do not make sufficient progress.
Adoption	Metro Council may adopt the requirements, or petition the Environmental Quality Commission (EQC) for action. Under ORS 459A.065, the EQC could mandate business recycling in the tri-county wastshed if findings conclude requirements are necessary to meet the regional goal.	Metro adopts ordinance to set recycling target for the business sector applicable to the region's jurisdictions responsible for solid waste planning.

Table 2. Program Comparison

Table 2. Program Cor	Program Options 1 and 2: Mandatory Recycling	Program Option 3: 90% Business Standard
New Recovery	80,000 tons	35,000 tons to 80,000 tons
Impact on Business Performance	Likely to achieve 95% capture rate13% increase over current level	At a minimum, would achieve 88% capture rate6% increase over current level
Timeframe for Achieving Goal	July 1, 2008 to June 30, 2010	January 1, 2008 to June 30, 2010
Risk for Achieving Goal	Low (Low given success demonstrated by other cities)	High to Medium (High given local variability, Medium given history with education being only program to date)
Business Incentives	 Potential for reduced overall collection cost Potential for recyclables sale revenue 	 Potential for reduced overall collection cost Potential for recyclables sale revenue Additional incentives depending on local program
Increased Education	Additional \$100,000 to expand Recycle at Work program	Contingent on local programs\$100,000 available for local programs
Impact on Local Markets	Stable markets and sufficient processing capacity	Stable markets and sufficient processing capacity
Environmental Benefits	 71 metric tons of carbon equivalent savings. +1.7 trillion BTUs of energy savings – enough to power nearly 17,000 homes for one year. Green house gas reductions equivalent to nearly 54,000 cars driving one year Save equivalent of 1.4 million trees a year, almost 1.4 Forest Parks. 	 30 metric tons of carbon equivalent savings 715 billion BTUs of energy – savings enough to power nearly 7,000 homes for one year. Greenhouse gas reductions equivalent to 23,000 cars driving one year Save equivalent 600,000 trees a year, or just over half of the trees in Forest Park.
Ease of Implementation	 Possible resistance to regulatory approach Recommended by stakeholder work group Public surveys indicate support for program from both households and businesses 	 Additional administration for local program development and implementation Potential lack of resources or resource focus in each jurisdiction