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July 2, 2012

Carroll Mortensen
Director
California Department of Resources Recycling and Recovery
(CalRecycle)
via email

Subject: California's New Goal: 75% Recycling Comments

Dear Ms. Mortensen:

Thank you for the opportunity to comment on the May 9, 2012 Report entitled California's New Goal: 75% Recycling. To meet the 75% reduction goal by 2020 will be a difficult challenge that can only be achieved by all parties, (CalRecycle, local government, private sector, etc) working together. Below are my comments on the two key areas, The Numbers and Focus Areas.

The Numbers

CalRecycle, in response to AB 34,1 is proposing to change the measurement system to only include source reduction, recycling and composting. In general I agree with the changes to how the 75% goal will be calculated. In particular, ADC and beneficial reuse at landfills should not be counted as diversion.

Focus Areas

This report focuses on a top down approach to achieving high diversion. Of the 50 or so Focus Areas, most of them list CalRecycle as the implementing Authority. For many reasons, this approach is fundamentally flawed. CalRecycle should provide the broad policy approach/goal and then rely on local government and the private section to implement it. Below are examples of broad policies that CalRecycle could adopt.

Given the greenhouse gas impact of organics, CalRecycle could adopt a policy to prohibit the landfilling of organic material. This would be raising the bar of the current policy of a 50% reduction.

A second policy option could be the adoption of the approach in Germany where no unprocessed material can be landfilled. There are 4 different waste streams that would need to be addressed: residential waste, commercial waste, construction and demolition waste and self hauled waste. For residential and commercial waste, there could be a requirement that all garbage customers have free recycling (included in the garbage service price) that includes all feasible recyclables including greenwaste and food waste. Construction and Demolition waste there could be a requirement that this waste must go to C&D recovery facilities. Finally self haul waste should go to resource recovery parks instead of directly to landfills. The plan should refrain from prescribing particular technologies or performance stands for individual facilities.

A third policy option, also used in Europe, would be to impose a significant tip fee surcharge on waste. These funds should be directly passed through to local governments to fund the implement source reduction, reuse and recycling programs.

These bold policies would give the private sector and local government the direction and resources they need to implement the programs that will result in 75% diversion. Only through creating a level playing field could individual programs be adopted on the local level.

Sincerely,


Bill Worrell