



May 17, 2013

Caroll Mortensen
Executive Director
CalRecycle
1001 I Street – P.O. Box 4025
Sacramento, CA 95812-4025

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Dear Ms. Mortensen,

The Northern California Recycling Association is a group of people dedicated to representing the business interests of reuse, recycling, and composting companies all over the state. For over three decades NCRA has promoted source separation and conservation of resources together with ending the practice of wasting resources in landfills or incinerators.

NCRA stands for Zero Waste; but we support the state's 75% near-term waste reduction goal because we know that when 75% is achieved by all jurisdictions, getting everyone to zero waste will be all that much easier.

We understand and applaud your honest reappraisal of where California stands with respect to the 75% goal. For some, the findings you report will be a shock: instead of 66% diversion from wasting, the numbers show that Californians' achievement is much lower: only 49%. It took courage for you to admit that California's vaunted recycling rate is less than most people believe. Please accept our thanks.

Close observers have known for years that this statistical anomaly is caused by a faulty counting method.

We know that treating wasting as recycling just won't do, no matter how cleverly the results may be disguised with labels like "alternative daily cover," beneficial reuse," or "transformation." Closing the door on these regulatory loopholes is necessary because their collective effect on "real" wasting is to increase it. As the numbers in your position paper show, to continue conducting business as usual with the "wasting five" getting recycling credit for resource destruction is to approve and extend the life of the biggest remaining barrier to achieving the goal set by the Legislature!

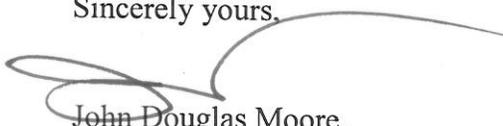
We do take issue with your use of the word "disposal" to stand for "wasting." Our member business enterprises compete in an open marketplace for both supply and

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demand. We deal in resources, but we also provide services. One of those services is disposal. We think disposal by reuse, recycling, and composting makes more sense than disposal by wasting. Therefore, we think the state should take concrete actions to bolster free market competition for disposal service fees. You cannot carry out this responsibility very well if you say disposal every time you mean wasting.

Finally, we congratulate you on putting together fifty pages of things the state can do to move us incrementally along the road to true Zero Waste. With so many good and profitable ideas about how to proceed, we can only hope that the idea of building new or rebuilding old zero waste transfer facilities does not get lost in the shuffle.

Sincerely yours,



John Douglas Moore,

General Legal Counsel and Board Member of Northern California Recycling Association