

Californians Against Waste (CAW) thanks CalRecycle for its work and support of biobased plastics research. After reviewing the discussion paper on biobased and degradable plastics, we respectfully submit the following comments.

1. (page 37) CAW sponsored Senate Bill 567 (DeSaulnier) False Environmental Advertising of Bioplastics, which passed into law in 2011 and became effective in 2013. SB 567, like its predecessors, aimed to protect the environment, eco-conscious consumers, and the waste management industry from biobased plastics with false end-of-life claims. We would like the document to further clarify that there is currently no “established scientific standard specification” for biodegradable plastics due to a lack of consensus among experts and the contentious nature when defining the term. In addition to the 2012 settlements, we would update the document to note that the California State Attorney General’s “greenwashing” lawsuit resulted in a 2013 settlement by the third party in the lawsuit. For more information, please see the attached document.
2. It may also be useful to note the recent enforcement actions taken by the Federal Trade Commission against biodegradable plastic claims in 2013. For more information, please visit <http://www.ftc.gov/news-events/press-releases/2013/10/ftc-cracks-down-misleading-unsupported-environmental>.
3. Finally, while we recognize that there is already an in-depth discussion of additives on page 63 (*Will additives subtract?*), we strongly recommend referencing the issue of additive-based products prior to that during *the contamination conundrum* discussion. The section on *New materials in the mix* (page 48), which discusses PLA contamination, could include a discussion of the issues that additive contamination bring to the recycling stream by potentially degrading resin quality, as well as the compost stream by not breaking down properly. This could then be followed by a referral to the subsequent sections on additives.

Thank you for your assistance.

Sincerely,

**Sue Vang**

Policy Associate | Californians Against Waste  
921 11th Street, Suite 420 | Sacramento, CA 95814  
(p) 916-443-5422 | (f) 916-443-3912  
[www.cawrecycles.org](http://www.cawrecycles.org)

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