



Representing Household & Institutional Products

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November 21, 2014

Via e-mail - Cynthia.Dunn@CalRecycle.ca.gov

Cynthia Dunn, Senior Environmental Scientist  
California Department of Resources Recycling and Recovery  
1001 I Street  
Sacramento, CA 95812-4025

**RE: CalRecycle Packaging Workshop Background Paper “Increasing Collection and Recovery of Packaging in California”**

Dear Ms. Dunn:

The Consumer Specialty Products Association<sup>1</sup> (CSPA) appreciates this opportunity to respond to the CalRecycle Packaging Workshop Background Paper “Increasing Collection and Recovery of Packaging in California.”

As a matter of policy, CSPA encourages consumers to minimize waste by using the following strategies before considering disposal options:

- Buy only what is needed;
- Use up products or give them away to someone who can; and
- Recycle empty containers.

In situations where such action is not feasible, consumers are encouraged to dispose of leftover products in an appropriate and environmentally responsible manner. In many cases, manufacturers provide guidance for appropriate disposal options.

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<sup>1</sup> The Consumer Specialty Products Association (CSPA) is the premier trade association representing the interests of companies engaged in the manufacture, formulation, distribution and sale of more than \$100 billion annually in the U.S. of familiar consumer products that help household and institutional customers create cleaner and healthier environments. CSPA member companies employ hundreds of thousands of people globally. Products CSPA represents include disinfectants that kill germs in homes, hospitals and restaurants; air fresheners, room deodorizers and candles that eliminate odors; pest management products for home, lawn and garden, and pets; cleaning products and polishes for use throughout the home and institutions; products used to protect and improve the performance and appearance of automobiles; aerosol products and a host of other products used every day. Through its product stewardship program, Product Care<sup>®</sup>, and scientific and business-to-business endeavors, CSPA provides its members a platform to effectively address issues regarding the health, safety and sustainability of their products.

## Recommendations

CSPA appreciates the goal of expanding recycling of all packaging materials and offers the following recommendations for consideration as CalRecycle continues development of the issues explored in the CalRecycle Packaging Workshop Background Paper, “Increasing Collection and Recovery of Packaging in California:

- CalRecycle should first focus on voluntary programs and public/private partnerships to take advantage of existing and developing programs, and avoid programs that may create unnecessary regulatory burdens on businesses and consumers.
- CalRecycle should add printed material (newspaper, magazines, etc.) to the definition/scope in recognition of the significant impact these materials have on the waste stream.
- CalRecycle should convene industry stakeholder meetings to assist in defining what partnership with industry would encompass as CalRecycle considers strategies to achieve the 75% recycling goal by 2020.
  - As a majority of consumer product-packages are recyclable in the current California infrastructure, it is not clear what “partnership” would entail.
- CalRecycle should develop a comprehensive plan about how it hopes to achieve the 75% recycling goal by 2020.
  - Based on available statistics (2008 California Waste Characteristic Study), ~50% of the waste stream comes from commercial sources and another ~17.2% comes from commercial self-hauled sources: that means 67% of the waste stream comes from commercial sources however most of the conversation is focused on residential solutions.
    - Development of a comprehensive plan that includes approaches on commercial waste, organics, etc., and anticipated reductions from each stream will help identify gaps that need to be filled.
    - Some of the focus categories are relatively small contributors to the waste stream which may not effectively assist the State in achieving the 75% recycling goal.
- Waste2Energy should be included in CalRecycle’s recovery goals.
  - Technologies that return packaging to oil to be used for other products or energy is a type of recycling and should be recognized and encouraged.
- CalRecycle should review and consider the interface with other statutory recycling/reduction programs and proposals to achieve the 75% recycling goal, and make recommendations for reductions in regulatory duplication and elimination of programs that may hamper the State’s ability to achieve the 75% recycling goal.
  - Policies developed may reduce the effectiveness and therefore eliminate the need to continue certain programs under the auspices of CalRecycle and other agencies which would require statutory repeal and shutting down some regulatory programs.
- While CSPA does not support mandatory take back programs, CalRecycle should explore a “shared” responsibility approach when considering funding options with each level of the supply chain contributing.

- Manufacturers, distributors, retailers, and consumers have shared responsibility for appropriate recycling of packaging and should share in the funding of recycling.

CSPA appreciates the opportunity to comment on the white paper and looks forward to continuing the discussion of best practices and policies to achieve the State's 75% recycling goal.

Respectfully,

A handwritten signature in cursive script that reads "Kristin Power".

Kristin Power  
Vice President, State Affairs

cc: CSPA State Government Affairs Advisory Committee  
Tim Madden, Randlett Nelson Madden