

**Comments from Stakeholders on the California Carpet Stewardship Plan
As of 1-13-2012**

Comment Number	Commenter	Representing	Links	Summary
W01	Mark Murray	Californian's Against Waste	<p>Since the last day for comments is January 16, 2012, which is a holiday, the documents will be posted on the web after the public meeting on January 17, 2012.</p> <p>The documents will be accessible from this webpage: http://www.calrecycle.ca.gov/EPR/PolicyLaw/Carpet.htm</p>	<p>CAW does not believe that the plan as proposed satisfies the spirit and intent of AB 2398. The primary objection of CAW is that the proposed program is targeting an unacceptably low recycling rate of just 16% of generated carpet by 2016. CAW maintains that California residents and businesses are already recycling well in excess of 50% of all generated waste, and earlier this year Governor Jerry Brown signed legislation increasing the state's overall recycling rate to 75% by 2020 with AB 341.</p> <p>With consumers being charged a carpet recycling fee by manufacturers, at the very least they deserve a real and meaningful carpet recycling effort, and 16% recycling is simply not a meaningful effort. Without a serious effort on the part of carpet manufacturers to achieve at minimum, a 25% carpet recycling level in California by 2016, CAW feels compelled to return to the Legislature with a more prescriptive manufacturer responsibility strategy for increasing recycling in California.</p>
W02	Melanie Nutter	SF Environment	See above	<p>CARE's Carpet Stewardship Plan sets a recycling rate of 16% of discarded carpet by 2016, and the City and County of San Francisco considers this to be far too low. Not only does it fall far short of the diversion targets established by San Francisco but the goals for the State of California as well. We think higher standards are achievable and higher recycling rates should be expected.</p> <p>We strongly encourage CalRecycle to not approve CARE's Carpet Stewardship Plan until substantially higher recycling goals are in place, at a minimum 25% by 2016 and higher rates, such as 50% a few years later.</p>
W03	Chuck White	Waste Management	See above	<p>WM commends CARE for developing a plan that is consistent with the provisions of AB 2398 and is pleased that the plan recognizes WM as one of CARE's carpet reclamation partners. However, WM is disappointed that projected 16% recycling rate for carpets in California is far lower than could be achieved with an aggressive collection program.</p> <p>The most significant concern for WM is the lack of credible and viable processing capacity for the recycling of carpet. Currently, there are three carpet processors</p>

				<p>throughout the State and only one of them has remained a viable option. Financial burdens, inadequate processing capacity, and unfavorable working and environmental conditions are just a few of the issues that WM has encountered. As a result, WM has stopped delivering carpet from customers to processors causing financial burden to WM. It is WM's impression that processors may have underestimated the volume of "unrecyclable material" that they actually would receive and this has resulted in both a high build up of unrecyclable material at their facilities as well as high landfill costs for disposing of the material that they ultimately cannot recycle.</p> <p>Identifying carpet also remains a challenge. Unless a carpet collector invests in expensive grading equipment and sets up a time intensive process to grade each "roll" of carpet received, the collector has no way of easily identifying the quality of carpet that is received. WM believes that if CARE truly wants to establish a collection and processing infrastructure that works and is economical, careful consideration will need to be given to how and when the grading process should take place and at what cost to whom. CARE might need to allocate some funds to relieve the burden placed on those ultimately responsible for grading material prior to collection and transport.</p> <p>Another concern for WM is the significant amount of apparently unused funds that are carried over every year. WM believes that if a significant portion of these "unused" funds were to be allocated for carpet fiber collection, the recycling rate for carpet fibers could be substantially boosted to greater than 16% by 2016.</p>
W04	Tom Padia	StopWaste.Org	See above	<p>StopWaste.Org supports an aggressive and meaningful goal for carpet recycling in California, such as 25 percent by 2016. The goal in the plan does not meet the "continuous and meaningful" improvement required by AB 2398.</p> <p>The plan states that increasing levels of carpet diversion will depend in part on increasing prices for oil and landfill tip fees. This seems inconsistent with the tenets of Extended Producer Responsibility, where the product stewardship organization normally has the responsibility to implement an end-of-life recovery system that offers "free and convenient" end-of-life disposal and produces higher recovery levels than result from current market forces and tip fee funding. Accordingly, the adopted plan should include potential adjustment to the five cent fee if goals are not met and/or to fully fund the program and keep diversion competitive with landfill disposal.</p>