

Attachment 5. Summary of Written Comments re: Manufacturers Challenge

Note: CR = CalRecycle MFRs = Manufacturers PKG = packaging

Organization	Summary of Written Comments
<b>American Chemistry Council</b>	<ul style="list-style-type: none"> <li>• Consider Oregon’s Plastics Recycling Assessment as a model to conduct a similar plastics assessment for California.</li> <li>• CalRecycle should use a sustainable materials management approach to prioritize recycling efforts as part of the 75 Percent Initiative.</li> <li>• CR should measure environmental outcomes versus weight.</li> <li>• Increase the tipping fee surcharge to fund additional CR activities related to this effort.</li> </ul>
<b>American Cleaning Institute</b>	<ul style="list-style-type: none"> <li>• A cost effective system of shared responsibility for end-of-life product/package management currently exists and works for consumers and the cleaning products industry.</li> <li>• CR should use the same baseline of pounds per person per day to measure progress toward the 75 percent goal as is used to measure local jurisdiction compliance with AB 939 (12.6 pounds per person per day).</li> <li>• Prioritize and reward source reduction.</li> <li>• Promote innovation.</li> <li>• Minimize recycling costs. Changes to the collection and recycling system should not increase the cost of recycled resin.</li> <li>• Changes to the current system should be subject to a cost-benefit analysis.</li> </ul>
<b>As You Sow</b>	<ul style="list-style-type: none"> <li>• The consumer goods and PKG sector missed a golden opportunity.</li> <li>• Most groups rehashed existing programs.</li> <li>• Didn’t hear anything that represented a new commitment specifically tailored to help the state meet its goal, or anything even approaching a comprehensive plan to cut PKG disposal in half.</li> <li>• Trade associations are typically not empowered to show dramatic leadership on new policies. They are only as strong as their most timid member, meaning obtaining consensus for bold commitments can be next to impossible.</li> <li>• Some kind of common platform is needed for industry groups to work together if there is serious interest in jointly meeting the challenge.</li> </ul>
<b>UPSTREAM</b>	<ul style="list-style-type: none"> <li>• Brand owners and trade associations want to continue to have the public subsidize their businesses through public expenditures.</li> <li>• Much of the discussion by the MFRs was directed at obfuscating that responsibility or otherwise highlighting national efforts rather than those taking place in California.</li> <li>• While MFRs were asked to present on how they are working to meet the specific goals set out by CR, there was more highlighting the need to tackle organics diversion and other efforts in order to meet the 75% Assembly goal rather than addressing the 50% PKG diversion rate.</li> <li>• Brand owners and their subsidiary MFRs, if responsible for end-of-life management will be able to optimize PKG design to meet infrastructure capabilities, or, in the alternative, invest in infrastructure such that it meets the needs of PKG design.</li> <li>• Based on the best data available in California, other US jurisdictions and foreign jurisdictions it appears clear that sustainable material management goals are only met when mandatory targets and centralized regulatory authority is asserted over the system.</li> </ul>