

Hi Kathy and Ferhut,

Sorry for the late catch, but this just came to my attention. The CA Stewardship Plan CARE has submitted uses nonfactual information regarding the failed MOU agreements as a rationale for its proposed recycling rates.

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In just 5 short years, the Plan is expected to achieve a recycling rate (output) of 16% by 2016, which is 33% higher than the national goal of 12% **agreed upon by the MOU Joint Committee in 2011.**

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**Note:** In August 2011, the MOU Joint Committee 2012 agreed to suspend negotiations for a new MOU. In the report issued by the MOU Joint Committee, **the Committee established a goal of 12% post-consumer carpet recycling (output) by 2016.** The goals for California are higher than the US goals. See bullet point 4 below.

- The timeframe of the California Carpet Stewardship Plan is 2011-2016. This updated Plan now includes actual results from Q3 2011 through Q3 2013 since the law was put into effect July 1, 2011. Further:

...

- The goals of the Plan exceed the national goals outlined in the **MOU 2012 Joint Committee Report, which was 12% recycling (output).** It is expected that this Plan will achieve a 16% carpet recycling (output) by 2016 for California.

There is no current MOU and of the agreements that were made by the JC and memorialized in the report (attached, see Section E and related Appendix B) recycling rates were not among them. They are found in the section of the report that discusses areas that the full JC did not vote to agree on before the negotiations were suspended.

I feel strongly that this is a mischaracterization of what occurred and is used to strengthen the rate they put forward in the plan. All language that refers to the MOU process should be review and corrected for factual errors.

Thanks,

Shannon McClelland

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**It is not enough to fight for the land; it is even more important to enjoy it. ~ Edward Abbey**