

To: Scott Smithline, Director, CalRecycle

Dear Scott,

I support the staff recommendation for Provisional Approval of Addendum #3 to the California Carpet Stewardship Plan.

The response of the carpet industry to date has not been impressive. I am particularly troubled by their continued reference to market forces as the source of their troubles, as if the carpet industry is not an integral part of these market forces. I believe follow up to ensure that the industry meets its stated goals, and does not merely return with more excuses, is essential.

As you know, among the goals of extended producer responsibility (EPR) is to incentivize producers to develop products and processes which provide for easy recycling and minimize the need for landfill disposal. Clearly the Carpet Stewardship Program has not yet succeeded in this goal. The carpet producers lament the lack of a market for their discards, but offer no plan to either use the recycled material themselves or to change their processes to produce a more sustainable product. It is possible that increased incentives will spur other third-party processors to solve the problem, but it seems unlikely.

I suspect that the producers will be back before you at the end of the review period with more hands-in-the-air complaints about others failing to solve their problems. It seems clear to me that the only ones who can solve this problem are the carpet industry themselves, and I hope you will encourage them to do so, not only to help solve the problem of carpet disposal, but to set a proper example of a functioning EPR program when such programs are still fairly new to California.

Thank you,

Tim Goncharoff  
County of Santa Cruz