

To CAL RECYCLES - NEW PROGRAMS FOR GHG REDUCTION COMMENTS

From: David Haskell, Chairman, Sierra Club Zero Waste Committee

POLICY DIRECTION TO BE COMMENDED

The policy direction of the Cal Recycles work program is to be commended. It addresses two of the primary Zero Waste infrastructure deficiencies in California. However, as is so often quoted, the devil or hopefully angels are in the details. The program is on target with regards to policy direction, however it appears to be woefully short on providing the resources and programs needed to effectively be a game changer in regards to GHG reduction.

NEED ADEQUATE RESOURCES TO ADDRESS CHALLENGE OF CLIMATE CHAOS

Solutions to resolve problems must be at a commensurate scale to effect the type of positive change required.

ZERO WASTE IS A SOCIAL CHALLENGE WHERE SUPPLY-SIDE SOLUTIONS ARE OF LITTLE VALUE – PROPOSED PROGRAM MIRED IN SUPPLY-SIDE SOLUTION MENTALITY

The project selection criteria targets expanding existing one-off “larger scale” projects rather than promote a more ubiquitous decentralized community-based transformation aimed at reducing the volumes of food wasted and /or the recovery of organic resources. It is recommended that Instead of relying on a few larger-scale projects – as required by the program designers – the program would better serve its GHG goal by supporting grass-root community-based food waste diversion / composting / vermaculture / community composting - gardening projects. Zero Waste is first and foremost a social problem – applying “technical fixes” has appeal because they are easier to account; but in the long run a few one-off projects will not contribute to the critical mass required to transform people’s attitudes and habits to stop producing food wastes and mismanaging organic materials. The program is mired in “supply-side” thinking that does not adequately address the myriad of opportunities for eliminating / reducing the volume of food wastes and managing organics for community benefit. We need to enlist 38,059,000 Californians to assist in delivery of the solution. A basic tenant of the program should be to minimizing food wastes and managing residual organic material as close to the source as possible. Hundreds of small-scale community inspired organic recovery programs will be far more effective in changing mind-sets to stop wasting than a small collection of organic processing entities as the program proposes.

BAN ORGANICS IN LANDFILLS

The program could be vastly improved if it allocate a portion of the funds to assist local authorities apply regulations that banned organic material from disposal at landfills. Clear targets need to be set to start banning organics from disposal starting in 2015. All waste haulers must be required to provide for source separated organic collection in any publicly funded waste collection contracts. The burden to perform should be devolved to communities to solve themselves. The \$30M Program budget would be better spent if it supported a state wide mandate for all organics to be diverted away from disposal. Start from that single policy position and build the programs around that goal.

SUPPORTING SECONDARY MATERIALS REMANUFACTURING OF RECYCLABLES

It is agreed that the secondary market for remanufacturing of recycled materials in California is near non-existent after years of market dominates by major Asian companies. The amount of funds allocated to assist this rebuilding effort, however is not sufficient to make a major impact. However, the use of a

revolving fund is at least a good starting place – it is a way to begin the process of rebuilding industrial capacity to recycle materials in California. We recommend that the revolving fund be increased annually as funds become available.

Thank you for the opportunity to comment and we hope you have a successful program review.

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