



Recyclers Global Warming Council

July 11, 2013

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Teri Wion
California Department of Resources Recycling and Recovery
P.O. Box 4025, MS-13A
Sacramento, CA 95812-4025

Re: Waste Management Sector Plan

Ms. Wion:

The Recyclers Global Warming Council (RGWC) of the California Resource Recovery Association (CRRA) represents interests within the CRRA and overall resource recovery industry to address the issue of climate protection through Zero Waste strategies: reduce, reuse, recycling, composting and product stewardship. The CRRA is the oldest and one of the largest non-profit organizations in the United States dedicated to reducing waste, pollution, and green house gas production through Zero Waste strategies.

RGWC appreciates the opportunity to provide input on the Waste Management Sector Plan (Plan). While the published Plan overview and June 18th draft implementation plan include many worthwhile recommendations, we recommend that ARB focus on the following as priorities:

- Cap and trade compliance offset protocols for composting and anaerobic digestion be adopted. The Climate Action Reserve has adopted protocols for voluntary trading markets, but the Air Resources Board has no for AB 32. Protocols would improve the financial viability of facilities, further incentivizing waste reduction and in-state landfill methane greenhouse gas (GHG) reductions.
- Waste sector emissions reduction goals for total emissions (i.e., direct plus indirect – 75% reduction by 2020), as well for specific materials (e.g., reduce waste carpet emissions by 75%) be established, so as to target not only reductions in downstream emissions but also the more significant upstream emissions.
- Any high-temperature thermal processing technologies be limited to uniform, controlled feedstock such as agricultural scrap. They should not be used for mixed municipal solid waste, which is not a sustainable feedstock for energy production and only facilitates continued resource depletion as landfills do. Waste-based energy technologies using mixed waste feedstock institutionalize waste, making it a “commodity” feedstock for energy production. These facilities require large energy inputs to capture only fractions of the embodied energy in wasted material - net energy output is unproven and disputed. The safe containment of hazardous outputs produced by these facilities is unproven; disposal of toxic by-products and emissions to air, land and water are significant public health concerns.
- Specific and tangible organics waste reduction actions be taken, including (a) establishing a defined timetable for requiring phase-out of organics disposal, and (b) expanding in-state organics processing capacity (composting and anaerobic digestion). Doing so is necessary to achieve waste reduction goals and reduce GHG's from avoided landfill methane, displacement of fossil fuel with biogas, and reduced synthetic fertilizer and water usage from use of finished compost.

- An extended producer responsibility (EPR) framework be established, prioritizing high-GHG commodities, products with high toxicity, and difficult to recycle products. EPR has significant GHG emissions reduction impact with low implementation cost by giving producers a financial incentive to design products that close the loop by being easy to repair, reuse, and recycle.

The Recyclers Global Warming Council (RGWC) of the California Resource Recovery Association (CRRA) appreciates the opportunity to provide input to this important project. Thank you for your consideration of this request.

Best Regards,

Mark Gagliardi, Chair
CRRA, Recyclers Global Warming Council

The views expressed by the RGWC do not necessarily reflect the views of the California Resource Recovery Association, its Board of Directors or membership.