

Comments on CARE 2014 Calif Carpet Stewardship Annual Report

The Report clearly demonstrates that this program is seriously under performing. Recycled Output declined in 2014, reaching 2012 levels. Percentage of Recycled Output actually recycled dropped drastically from 2013 levels. Generators and collectors are faced with the same situation that existed prior to the program -- few outlets and high costs to recycle carpet interspersed with period market collapse. Carpet has embedded energy and greenhouse gas emissions that are second only to aluminum. Failing to create meaningful recycling opportunities will hinder CalRecycle's ability to meet its GHG reduction goals. California consumers are paying over \$5 million annually and receiving no appreciable benefit. The 71% reserve needs to be invested in recycling infrastructure. CARE has shown through its national Voluntary Product Stewardship Program that it has additional resources but would rather let our consumers pay them directly to do next to nothing.

CalRecycle should reject the report; consider fines and a compliance program; and recommend legislative fixes to stop the travesty.

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