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**Californians
Against Waste**

July 25, 2016

Attention: Fareed Faridoon
Department of Resources Recycling and Recovery
1001 I Street
Sacramento, CA 95812
Submitted via email: carpet@calrecycle.ca.gov

SUBJECT: STAKEHOLDER COMMENTS ON CARE'S 2015 ANNUAL REPORT

Dear Mr. Faridoon:

Pursuant to the requirements of California's AB 2398, Carpet America Recovery Effort (CARE) is tasked with demonstrating to CalRecycle "that it has achieved continuous meaningful improvement in the rates of recycling and diversion and other specified goals in order to be in compliance." However, CARE's 2015 Annual Report instead shows that carpet recycled output has remained virtually unchanged for the five years of reporting since program inception and in fact, went slightly down from a recycling rate of 12% in 2013 and 2014 to just 10% in 2015. **Due to this weak performance for five years running, we urge you to deem CARE non-compliant and enforce the law accordingly.**

The one hundred and eighty-one-page report is replete with excuses and appears to be an attempt to cloud the facts and distract the reader. This reporting style is consistent with CARE's overall operating strategy – a strategy that lacks focus, meaningful action and effectiveness. Various red herrings are highlighted in the report as reasons for the recycling rate decline including the port labor dispute and China's decreased demand when export does not count towards CARE's California recycling numbers.

In the meantime, many California consumers who are paying the carpet fee are not able to benefit from this program. The report summarizes payments to manufacturers, the largest subsidy payment but does not identify amounts paid to each entity. However Table 9 shows that 6 of 7 Tier 2 manufacturers are outside California. CARE has not provided sufficient convenient collection opportunities for many Californians, Figure B shows the focus is almost completely on small rural counties while all of Southern California is unserved. This report demonstrates that CARE has not invested in adequate staff resources, has not provided basic education to collectors, and does not reach out to installers who primarily discard carpet.

It's been 6 years since the enactment of Assembly Speaker Perez's AB 2398 and we have not seen any demonstrable progress in carpet recycling in California under CARE's stewardship. **We urge CalRecycle to not approve CARE's 2015 Annual Report and enforce accordingly.** It is critical that the carpet industry design and implement a robust program that benefits everyone who pays the stewardship fee. California carpet consumers deserve better.

Sincerely,

Heidi Sanborn, Executive Director
California Product Stewardship Council

Teresa Bui, Legislative and Policy Analyst
Californians Against Waste

Doug Kobold, President
National Stewardship Action Council

Juliana Bryant, City Government Zero Waste Senior Coordinator
San Francisco Department of the Environment

John Davis, Administrator
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Cc: Bob Peoples, CARE
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Jim Hill, CalRecycle