

July 12, 2013

Director Caroll Mortensen  
CalRecycle  
P.O. Box 4025  
Sacramento, CA 95812-4025

**Re: Comments on Waste Management Sector Plan – AB 32 Scoping Plan Update**

Dear Director Mortensen:

The California Product Stewardship Council (CPSC) would like to commend CalRecycle and the California Air Resources Board for taking a comprehensive approach to analyzing the waste management sector. As CPSC only focuses on the Extended Producer Responsibility (EPR) policy aspect of waste management, our comments are solely focused on that issue.

The CPSC is an organization of local governments and businesses from all parts of California who have come together to support a transition to producer responsibility for managing discarded products. California local governments have now passed 135 resolutions supporting producer responsibility, representing sixty-three percent of the state's population. The stream of products requiring disposal and special end-of-life management is growing every year and some, have large GHG footprints.

As founding members of the Build Infrastructure Now (BIN) coalition, we believe the Department should identify more specific strategies for particular materials and manufacturing sectors. The strategies that would lead to more recycled cullet being used in glass production might not necessarily be the same that would lead to increased recycled paper production or domestic end markets for plastics that have historically been shipped overseas. A collaborative stakeholder process would help identify the tools successfully used by other sectors that might be applied elsewhere, as well as broad policies that would help expand recycling infrastructure in California.

Our key comment is that further development and refinement of the producer responsibility discussion to target products and materials that are significant sources of greenhouse gas emissions or, by virtue of their design, are not currently being recycled. EPR was identified in the original Scoping Plan, but insufficient action has been taken since then to even determine how or to even determine the GHG impacts of the existing carpet and paint EPR programs. Similarly, this update of the plan mentions it but the lack of specific actions makes it unclear what, if anything, the state plans to do. CalRecycle and ARB need to be clear in identifying which products that are still largely landfilled have the largest GHG footprint and propose producer responsibility strategies to reduce those impacts. Producers of products still disposed at far higher rates than other materials should bear significant responsibility to reduce those GHG impacts.

We look forward to working with staff to insure that existing EPR systems are fully documented as to their GHG benefit and that the future plan for applying EPR to address products that are disposed and have a large GHG footprint is clear and reasonable.

Sincerely,



Heidi Sanborn  
California Product Stewardship Council

CC: Secretary Matt Rodriguez, California Environmental Protection Agency  
Chair Mary Nichols, California Air Resources Board