



Association of California Recycling Industries

December 12, 2011

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

RE: Proposed Regulations to Require Commercial Businesses to Recycle

Dear Ms. Wion:

On behalf of the Association of California Recycling Industries (ACRI), I am writing to urge that the regulations that are currently under consideration regarding AB 341 eliminate any reference to exclusive recycling franchise agreements for commercial and multifamily property owners. If the regulations are approved as currently proposed, they would act as a disincentive to the recycling of these materials because of the consequential loss of their economic value.

ACRI is a nonprofit trade association comprised of recycling businesses throughout California. ACRI was founded in order to help protect the rights of independent recyclers, and its members are committed to promoting free-market competition for recyclable materials.

ACRI appreciates the opportunity to comment on the proposed regulation and concurs with the comments and changes proposed by our fellow trade association, the West Coast Chapter of the Institute of Scrap Recycling Industries (ISRI).

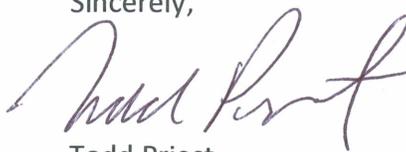
AB 341 made a legislative declaration that it is a policy goal of the State of California that not less than 75% of solid waste generated by source reduced, recycled, or composed by the year 2020. To best meet these demands, local jurisdictions should be encouraged to promote free market competition for recyclable materials whereas a restricted franchise agreement would negatively impact these to business and property owners therefore inhibiting the goals established under AB 341. It has been our experience that more competition, not less, will increase the commercial recycling rate and help achieve the laudable aims of AB 341.

Marshall Graham
December 12, 2011

By bringing the draft regulations into conformity with AB 341, CalRecycle will acknowledge and protect the important contributions that all recyclers make toward achieving the goals of AB 341.

We thank you for your consideration of our comments and recommendations, and we welcome the opportunity to further discuss the proposed regulation.

Sincerely,

A handwritten signature in dark ink, appearing to read "Todd Priest", written in a cursive style.

Todd Priest

cc: The Honorable Westley Chesbro