

Addendum to CalRecycle Responses to 45-day Comments, Proposed Regulation on Architectural Paint Recovery Program

Section/ Area	Comment Number	Commenter Affiliation	First name	Last name	Summary of Comment	CalRecycle Response	Revisions Needed
General Comment	W14-21	LA Co. Solid Waste Mgmt Cmte/Integrated Waste Mgmt Task Force/LA Co./Sanitation Districts of LA Co./City of LA	Margaret	Clark	Recovery Program: A key objective of AB 1343 is to establish an architectural paint recovery program (Recovery Program) that requires manufacturers or their designated stewardship organization to develop and implement a program to collect, transport, and process postconsumer paint to reduce costs to local governments and shift the costs to manufacturers and consumers. Consistent with CalRecycle’s Extended Producer Responsibility (EPR) Framework, such a program must be designed to maximize convenience to consumers, be adequately funded, and require minimal local government involvement. The proposed regulations should be revised and expanded to ensure these objectives are met.	Please see responses to comments W14-01 and W02-13.	--
General Comment	W14-22	LA Co. Solid Waste Mgmt Cmte/Integrated Waste Mgmt Task Force/LA Co./Sanitation Districts of LA Co./City of LA	Margaret	Clark	Consistency with EPR Framework: Except where in conflict with the requirements of AB 1343, the proposed regulations should establish a Recovery Program that is consistent with CalRecycle’s EPR Framework, including Framework Policy, Goals, Guiding Principles, Roles and Responsibilities, and Governance. For example, the proposed regulations should ensure system effectiveness, set minimum recovery rates, and establish minimum environmental standards as appropriate.	Please see response to comment W19-01.	--
General Comment	W14-23	LA Co. Solid Waste Mgmt Cmte/Integrated Waste Mgmt Task Force/LA Co./Sanitation Districts of LA Co./City of LA	Margaret	Clark	Collaboration with Local Governments: The proposed regulations minimally address and require the manufacturers or the designated stewardship organization to work collaboratively with existing local government collection programs to transfer the responsibility for managing post-consumer paint to manufacturers (or the designated stewardship organization) and consumers. As a general principle, stewardship plans should be designed to be stand-alone, that is, not dependent on a local government program since local government participation is voluntary. A stewardship plan that relies on a local government program must include a copy of the signed agreement established with the local government prior to being approved by CalRecycle. Also, provisions need to be incorporated into CalRecycle’s review and approval process to allow and consider local government input prior to approval of the stewardship plans.	Please see responses to comments W14-01 and W22-01. With regards to the comment about CalRecycle’s plan review and approval process, please see response to comment W14-04.	--