
From: Paul Hudson [mailto:phudson@scottgroup.com]
Sent: Wednesday, August 24, 2011 5:53 AM
To: Frevert, Kathy
Cc: Tim Hill; Mike Ruggeri; Rich Ruggeri
Subject: Comments for Product Stewardship for Carpet Rulemaking

Good Morning Kathy,

I've attached comments from Scott Group Custom Carpets regarding the Product Stewardship for Carpet Rulemaking. Thank you for receiving our feedback.

Paul Hudson
Controller

scott group custom carpets

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August 24, 2011

CalRecycle
801 K Street, MS 19-01
Sacramento, CA 95814

Re: Comments for Product Stewardship for Carpet Rulemaking

I am submitting comments on behalf of Scott Group Custom Carpets, a manufacturer of specialty carpets and rugs headquartered in Grand Rapids, MI.

We have previously researched the applicability of AB 2398 for wool carpets since some of our manufactured product is delivered to California. Per the response we received from CalRecycle, our carpets are not subject to the requirements of AB 2398, because they are made of 100% natural materials (wool yarns and cotton backing).

AB 2398 specifically emphasizes that the program is for carpets made of synthetic materials. As the legislators were likely aware, this emphasis on synthetic fibers is very important since most recycling facilities in CA do not accept carpets made from wool and similar natural fibers. If carpets made from natural fibers were included in the requirements of AB 2398, California consumers would be required to participate in a program that they were not allowed to use.

We are obliged to emphasize these facts since a comment was previously posted by CARE (Comment No. W03) suggesting that the definition of carpet for the Carpet Stewardship program be revised to include carpets made of natural fibers. Though not specifically called out in Comment W03, a significant change was proposed adding the word natural to the definition:

From: "...constructed of a top visible surface of synthetic face fibers...."

To: "... constructed of a top visible surface of synthetic or natural face fibers...."

We believe this revised wording is inappropriate given the inability of consumers to utilize recycling facilities for carpets made of wool or other natural materials.

It's also important to note that recycling carpets made from natural materials is completely unnecessary. The natural materials used (wool, cotton) are biodegradable, and if placed in a landfill will quickly decompose.

Though its importance is secondary, I must also note that carpets made of 100% natural fibers comprise less than 1% of the U.S. market according to the World Floor Covering Association



(www.wfca.org). Wool is an expensive material creating a very small, niche carpet market and would not generate revenue for the Carpet Stewardship program. The changes recommended by Comment W03 would only create an administrative burden for manufacturers and the state of California to remit and receive a few dollars--Scott Group's total recycling fees for 2010 would have been \$35, while costing thousands of dollars in administrative fees and costs.

We believe the wording initially established by AB 2398 is both intentional and appropriate. Making the change recommended under Comment W03 would be a disservice to the consumers of California and would create an unnecessary administrative burden on the state of California and manufacturers throughout the United States.

Sincerely,

Paul Hudson
Controller
Scott Group Custom Carpets, Inc.