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California Department of Resources Recycling and Recovery  
P.O. Box 4025, Sacramento, CA 95812  
Submitted via e-mail to: [form303@CalRecycle.ca.gov](mailto:form303@CalRecycle.ca.gov)

**RE: CPSC COMMENTS ON PROPOSED REGULATION FOR FORM 303 HOUSEHOLD  
HAZARDOUS WASTE COLLECTION REPORT**

Dear Emily:

The California Product Stewardship Council (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 133 resolutions supporting producer responsibility, representing sixty-three percent of the state's population.

Significant and growing shares of consumer products contain hazardous constituents and are banned from landfill disposal, requiring special handling at the end of their useful life. Local government household hazardous waste (HHW) programs around the state have been identified as the primary collection mechanism, and have borne the burden of managing these discarded products for many years. The implementation of this regulation should reduce local government HHW collection reporting costs and standardize reporting for products managed under newly established producer responsibility programs in the State. **We support the proposed regulation.**

In order to ensure effectiveness of California's newly implemented producer responsibility programs, it is important to accurately and efficiently track the volume and disposition of products managed by product stewardship organizations. The proposed regulation will allow public agencies to report the products that they collect on behalf of stewardship programs. It will also provide CalRecycle with more flexibility when adding new products, which will aid in the tracking of products that are managed under future stewardship programs. The regulation will also create an online report database which will streamline the reporting process.

Thank you for the opportunity to comment on the proposed regulation to update California's household hazardous waste collection reporting and ensure reports capture data on products managed under new stewardship programs. We look forward to working with you as California's household hazardous waste management programs transition to producer responsibility systems!

Thank you for your consideration.

Sincerely,

Kimbra Andrews, Program Manager  
California Product Stewardship Council