CRRA
Ending waste.

California Resource Recovery Association

October 25, 2013

Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: AB 32 Scoping Plan – Waste Management and Zero Waste

Dear Chair Nichols,

CRRA is California's statewide recycling association. It is the oldest and one of the largest non-profit recycling organizations in the United States. Our members work for cities, counties and municipal districts, as well as hauling and recycling companies, material processors, non-profit organizations, state agencies, and allied professionals.

CRRA appreciates the opportunity to provide input on the AB 32 Scoping Plan (Plan). The published review draft of the Plan includes many worthwhile recommendations. We recommend that the Plan prioritize the following:

1. <u>Divert organic wastes to address short-lived GHG methane emissions.</u> Take specific and tangible actions reduce landfilling organics, including establishing a defined timetable for requiring phase-out of organics disposal, expanding in-state organics processing capacity (composting and anaerobic digestion). Doing so is necessary to achieve waste reduction goals and reduce GHG's from avoided landfill methane emissions, and reduced synthetic fertilizer and water usage from use of finished compost.

2. <u>Limit waste-based energy technologies.</u>
   a. Eliminate consideration of cap-and-trade and Renewable Portfolio Standard credits for MSW Thermal facilities. The Waste Management Sector Plan developed by the ARB and CalRecycle acknowledges that "recycling, composting and anaerobic digestion, and biomass conversion result in even lower GHG emissions" than MSW Thermal facilities, since these facilities compete with recycling, composting and anaerobic digestion.

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b. Include incineration in cap-and-trade. Waste incineration facilities should be covered entities with compliance obligations under cap-and-trade.
c. Require any feed stocks under consideration for waste-based energy be addressed individually, using full life-cycle analyses to compare to source reduction, reuse, recycling and composting alternatives
d. Limit any high-temperature thermal processing technologies to uniform, controlled feedstock such as agricultural scrap. Exclude mixed municipal solid waste, as its use only facilitates continued resource depletion by institutionalizing waste as an unsustainable "commodity" feedstock for energy production. High-temperature thermal processing uses require large energy inputs to capture only a fraction of the embodied energy in wasted material - net energy output is unproven and disputed. The safe containment of hazardous outputs produced by these facilities is unproven; disposal of toxic by-products and emissions to air, land and water are significant public health concerns.

3. Adopt cap-and-trade compliance offset protocols for composting and anaerobic digestion. The Climate Action Reserve has adopted protocols for voluntary trading markets, but the Air Resources Board has no for AB 32. Protocols would improve the financial viability of facilities, further incentivizing waste reduction and in-state landfill methane greenhouse gas (GHG) reductions.

4. Establish waste sector emissions reduction goals for total emissions (i.e., direct plus indirect – 75% reduction by 2020), as well for specific materials (e.g., reduce waste carpet emissions by 75%). Doing so targets not only reductions in downstream emissions, but also the more significant upstream emissions.

5. Establish an extended producer responsibility (EPR) framework. Prioritize high-GHG commodities, products with high toxicity, and difficult to recycle products under an established EPR framework. EPR has significant GHG emissions reduction impact with low implementation cost by giving producers a financial incentive to design products that close the loop by being easy to repair, reuse, and recycle.

6. Focus on waste reduction, especially for food and packaging waste. CalRecycle can provide statewide leadership to change unnecessarily wasteful individual and institutional behavior, using community-based social marketing techniques to overcome obstacles.

7. Provide a consumption based view of California's greenhouse gas emissions. Consumption inventories, linked with materials management efforts, provide more accurate and nuanced understanding of end-of-life issues within the full product

lifecycle. Focusing solely on "waste management" limits decision-maker and public support by understating product impacts.

8. Include an alternative analysis of methane emissions, emphasizing the short-term benefits of immediate methane reduction to limit temperature increases. Demonstrate the volume of methane emitted using its actual atmospheric life rather than standardizing to carbon dioxide.

9. Finally, we are concerned about the logic of counting all biomass conversion emissions as biogenic. The Biomass Conversion technical paper says, "[w]hile these facilities result in direct GHG emissions (mostly as carbon dioxide) when biomass is burned, the majority of these emissions are biogenic, and not counted as discussed above." Biomass conversion is an anthropogenic process and accelerates natural biogenic emissions. Note that the Recycling Emissions Reduction Factors indicate a much lower factor for dimensional lumber than EPA's Waste Reduction Model. In fact, WARM's factor is about ten times greater than the RERF.

CRRA appreciates the opportunity to provide input to this important project. Thank you for your consideration of our comments.

Tracie Bills
President

CRRA, founded in 1974, is California's statewide recycling association. It is the oldest and one of the largest non-profit recycling organizations in the United States. CRRA is dedicated to achieving environmental sustainability in and beyond California through Zero Waste strategies including product stewardship, waste prevention, reuse, recycling and composting. CRRA advances local, regional and state wide waste reduction efforts which result in critical environmental and climate protection outcomes. CRRA's members represent all aspects of California's reduce-reuse-recycle-compost economy. Our members work for cities, counties and municipal districts, as well as hauling companies, material processors, non-profit organizations, state agencies, and allied professionals.

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