

November 1, 2013

Attention: Caroll Mortensen  
Department of Resources Recycling and Recovery  
1001 I Street  
PO Box 4025, MS 13A  
Sacramento, CA 95812  
Submitted via email: [climatechange@calrecycle.ca.gov](mailto:climatechange@calrecycle.ca.gov)

**RE: COMMENTS ON AB 32 SCOPING PLAN UPDATE – WASTE MANAGEMENT SECTOR**

Dear Director Mortensen:

The California Product Stewardship Council (CPSC) would like to commend CalRecycle and the California Air Resources Board (ARB) for taking a comprehensive approach to address greenhouse gas (GHG) emission reduction strategies in the waste management sector. As CPSC only focuses on the Extended Producer Responsibility (EPR) policy aspect of waste management, our comments on the October 2013 AB 32 Scoping Plan Update (Update) are solely focused on that aspect. CPSC previously submitted a comment letter on July 12, 2013, and this letter is simply restating those comments.

CPSC is the preeminent California based organization dedicated to EPR research, education, and implementation. CPSC has the support of numerous cities, counties, local government associations and business partners in virtually every Senate and Assembly district, representing over 64 percent of California's population. CPSC takes pride in coordinating closely with others to ensure that California policies maintain the integrity of the [Principles of Product Stewardship](#).

The stream of products requiring disposal and special end-of-life management is growing each year, and some products have large GHG footprints. **The State can significantly reduce waste at the source and GHG emissions by expanding EPR policy.** Therefore, we urge the ARB and CalRecycle to lead in the full implementation of the strategy to expand EPR policy, as outlined in the State's AB 341 waste reduction goals.

The lack of specific actions in the Update makes it unclear what the state plans to do to expand EPR policy. Similarly, insufficient action has been taken to determine the GHG impacts of the existing carpet and paint EPR programs. The Update needs to be clear in identifying which products have the largest GHG footprint, and propose EPR strategies to reduce those impacts.

Our key comment is that further development and refinement of the EPR discussion is needed to target products and materials that are significant sources of GHG emissions or, by virtue of their design, are not currently being recycled. **The primary focus of EPR policy should be on those products that have the largest GHG footprints, in addition to toxic and hard-to-recycle products, and products that are dangerous to handle and impede all recycling (such as sharps), which would impact GHG emissions.**

We are happy to continue working with CalRecycle and the ARB to ensure that existing EPR systems are fully documented as to their GHG benefit, and that the plan for applying EPR to address products that have a large GHG footprint is clear and reasonable. The Update needs more focus on extended producer responsibility policy and source reduction, and we look forward to working with staff to ensure it is updated to meet the goals of AB 32.

Thank you for the opportunity to comment.

Sincerely,



Heidi Sanborn, Executive Director

Cc: Secretary Matt Rodriguez, California Environmental Protection Agency  
Chair Mary Nichols, California Air Resources Board  
Howard Levenson, CalRecycle  
Teri Wion, CalRecycle