



January 21, 2008

Economic and Technology Advancement Advisory Committee
California Air Resources Board
By email to schurch@arb.ca.gov

**Re: December 21 draft final report
Support for the recycling aspects**

Honorable Committee Members:

The Northern California Recycling Association was founded in 1976 as the Association of Bay Area Recycling Groups and Environmentalists [ABARGE], assumed its present name in 1982, and was incorporated as a 501(c)(6) organization in 1992. We believe that total recycling is an antidote to the wasting practices of our society and that a proper combination of federal and state policy, local leadership, private business initiative and concerned citizens can end the era of wasting.

In 1976, in the Congressional findings preceding RCRA, the Congress wrote (42 USC. s.6901 (c)) "The Congress finds with respect to materials, that: (1) millions of tons of recoverable materials which could be used are needlessly buried each year; (2) methods are available to separate usable materials from solid waste; and (3) the recovery and conservation of such materials can reduce the dependence of the United States on foreign resources and reduce the deficit in its balance of payments." In 2006, thirty years later, in its RCRA ORIENTATION MANUAL, 2006 (online), the USEPA noted that "recycling rates, which at one time were increasing, have become stagnant" (pp.4-1) and that a 35% recycling goal for the United States is still above our current performance (pp.4-7).

On the state level, we have seen similar stagnation. In 1990 the State produced 44 million tons of waste; in 2005, the last year for which complete data is available, California had 42 million tons of solid waste. A 4% decline in 15 years is not a successful program.

We also now know that resource conservation has impressive implications for reducing energy use. John Davis of our sister organization, California Resource Recovery Association, has calculated that recycling all the materials now wasted in California landfills will avoid 13.5 million tons of CO2 emissions annually. This is an impressive number.

The items currently in the recycling portion of the Industrial Section of your December 21 draft final report are a great improvement over previous drafts and mark the beginning of viable State policy in the resource management area. We have no particular objection to anything currently in the report.

ACTION REQUESTED: ADOPT APPROPRIATE ZERO-WASTE LANGUAGE

The USEPA's RCRA ORIENTATION MANUAL, 2006, mentioned above, includes these words on pages 4-6: We need "to achieve a future where waste is a concept of the past." The time is now to aim for that future. The term "zero waste" has been greatly bandied about lately and has been adopted as a goal by the California Integrated Waste Management Board.

But zero waste holds meaning as a step beyond "integrated waste management," which is increasingly seen as an inappropriate strategy to develop discarded resources into feedstocks for new production. For example, discarded materials have to be perceived as "waste" to be managed as waste, and in a zero-waste culture, the discards won't be perceived as waste in the first place. To promote the most effective thinking, appropriate terminology is crucial. We hope the report can use over-arching language to develop the public capability to think clearly in zero-waste terms.

I will leave it to Arthur Boone, our Education Chair, to expand on these remarks at the meeting on January 25.

Sincerely yours,

Mary Lou Van Deventer
President

mail to schurch@arb.ca.gov. Copies to Bob Epstein, Alan Lloyd,