

November 30, 2007

Alan C. Lloyd, Ph.D., Chair  
Economic and Technology Advancement Advisory Committee  
California Environmental Protection Agency  
1001 I Street,  
Sacramento, CA 95814

**Re: Waste Reduction and Recycling in Draft ETAAC Report**

Dear Chair Lloyd:

We appreciate the effort that your committee has put into the evaluation of a wide variety of technologies to reduce climate change, but we are concerned that the report missed an opportunity for significant GHG benefits from the waste reduction and recycling sectors. Furthermore, we are very concerned that instead of focusing on proven recycling and composting technologies, the report consistently places hope in a range of potentially risky and totally unproven “conversion technologies.” Despite the expenditure of millions of dollars, the state has yet to be able to quantify the health and environmental impacts of these technologies so the emphasis on them is misplaced. ETAAC should be focused on GHG-reducing recycling and composting technologies by recommending investment in programs and research that will ensure the backbone of our current recycling infrastructure will last despite regulatory challenges, siting problems, and artificially low landfill costs.

**Recycling and Waste Reduction:** The sections<sup>1</sup> that dealt with recycling and waste reduction in the Pre-Draft were inadvertently stricken from the Discussion Draft, and they should be reinserted and strengthened substantially. From the pre-draft, we saw that these sections identified the importance of recycling but failed to suggest specific actions to increase its role in achieving AB 32 reductions. CAW’s Scoping Plan submissions (attached<sup>2</sup>) outline some discreet actions that should be added to your report. ETAAC is missing a significant opportunity to cost-effectively reduce GHG emissions from the mining, manufacturing, forestry, transportation, and electricity sectors while reducing methane emissions from landfills. Conservative models indicate that a modest 25% reduction in disposal of materials commonly collected in curbside programs could reduce 5 MMTCO<sub>2</sub>E.

**Composting and Compost Utilization:** The production and application of compost provides multiple significant GHG benefits, including avoided landfill emissions, greater carbon sequestration in crop biomass and soil, a decrease in the need for GHG-releasing fertilizers and pesticides, and a decline in energy-intensive irrigation. Despite this, compost is auspiciously missing from the long list of suggested end-of-life organics

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<sup>1</sup> Sections 4-III(J) and 4-III(K) - Page 83/84 (of Pre-Draft)

<sup>2</sup> [http://www.cawrecycles.org/files/CAW\\_Scoping\\_Plan\\_Submittal.pdf](http://www.cawrecycles.org/files/CAW_Scoping_Plan_Submittal.pdf)

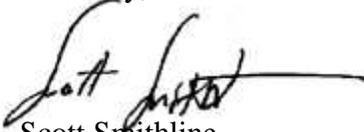
management technologies. Unlike the many conversion technologies that are presented in this document, compost is well established, proven, and has the ability to help support in-state agriculture. Furthermore, unlike the other technologies identified in the report, composting is explicitly identified as the highest and best use for organic materials under California's waste reduction and recycling laws.

**Conversion:** Throughout the report, ETAAC consistently implies that waste conversion technologies will be necessary for tackling climate change despite a lack of any quantifiable evidence that these technologies will reduce emissions over other management options. Despite the fact that the report advocates further study and analysis of these technologies, it continues to advocate the use of conversion technologies to manage ag-waste, urban wood-waste, forestry-waste, municipal solid waste, and other sources. The report seems to envision all the state's organics being fuel for these unproven, unsustainable, and potentially risky technologies. The report acknowledges that "the State currently lacks a comprehensive system for assessing the overall, lifecycle cost and benefits of bioenergy options,"<sup>3</sup> so it is unfounded to assume that they would result in GHG reductions over composting of the same material and without violating AB32's anti-back-sliding provisions.

In the introduction, the report states that "government policy should not attempt to pick technology winners. Rather, performance-based programs ... should be the norm."<sup>4</sup> However, ETAAC is clearly not heeding its own advice by "picking winners" in this area. The state should evaluate the lifecycle GHG impacts of all end-of-life management options, including composting and anaerobic digestion, before endorsing any conversion technologies.

Composting and recycling are proven technologies with a long track record of providing immense environmental benefit while stimulating economic growth, and they should not be overlooked by your committee. We look forward to working with your committee on this very important issue.

Sincerely,



Scott Smithline  
Director of Legal and Regulatory Affairs  
Californians Against Waste

cc: Members, ETAAC  
Steve Church, ARB

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<sup>3</sup> Page 9-46 (of Discussion Draft)

<sup>4</sup> Page 1-6 (of Discussion Draft)