



July 9, 2021

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**SUBJECT: Comments on Scoping Plan Update**

Net-Zero GHG for the Waste Sector has been defined by CARB in the 2014 Scoping Plan First Update, as highlighted below. To meet Net-Zero GHG, one's avoided GHG emissions must be greater than or equal to one's operational GHG emissions. By analyzing the operational versus avoided emissions, it will be possible to demonstrate that the Waste Sector is Net-Zero GHG now.

CARB and CalRecycle were tasked in the First Update to develop new emission reduction factors for estimating the GHG emission reduction potential of various recycling and remanufacturing strategies. To the extent data are available, these factors will include upstream and downstream emissions impacts. Financial incentives to build adequate in-state infrastructure and incentivize activities to accomplish GHG and waste reduction goals are critical.

The challenges and potential actions for the Waste Sector GHG emissions to accomplish the future GHG and waste reduction goals, were spelled out in the 2014 Scoping Plan First Update with the following proposed goals:

- Mid-term Goal of 2030-2035: Achieve Net-Zero GHG emissions from the entire Waste Sector
- 2050 Goal: Achieve a 25% reduction in direct GHG emissions from mid-term levels.

Based upon available California data, coupled with best practices in GHG modeling, it is estimated that the solid waste industry has avoided 3.7 times more GHGs than have been emitted, far ahead of the Mid-Term goal for 2030-2035. Should California implement the 2030 goals and policies of the 2017 Scoping Plan Second Update, it is estimated that the Waste Sector can avoid 9.9 times more GHGs than have been emitted. From 2018 to 2030, the Waste Sector can increase their Net-Zero GHG standing by 267%, as California plans a carbon neutral future in 2045 with the upcoming 2022 Scoping Plan Third Update. The Waste Sector is leading the way now and will continue to in the future should CARB recognize and incentivize the cost-

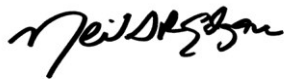


effective programs that are being deployed today. A copy of the Net-Zero GHG Report for the Waste Sector is linked below:

<http://edgarinc.org/california-is-net-zero-now/>

To achieve even greater diversion of organics and other recyclables commodities from landfills further expansion and enhancement of the alternative non-disposal pathways must be developed. In addition, greater emphasis will need to be placed on reducing the volume of waste generated, recycling/reusing products at the end-of-life and remanufacturing these materials into beneficial products.

Thank you,

A handwritten signature in black ink, appearing to read "Neil S. R. Edgar". The signature is fluid and cursive, with the first name "Neil" being the most prominent.

Neil S. R. Edgar

Executive Director

SB 1383,