

July 31, 2008

Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95812

**SUBJECT: CLIMATE CHANGE DRAFT SCOPING PLAN RE:
RECOMMENDED MEASURE #15 – “INCREASE WASTE DIVERSION, COMPOSTING,
AND COMMERCIAL RECYCLING AND MOVE TOWARD ZERO-WASTE”**

Dear Chairperson Nichols:

The California Product Stewardship Council (CPSC) is a non-profit California corporation comprised of local governments and associations. CPSC's mission is to shift California's product waste management system to one that relies on producer responsibility in order to reduce public costs and drive improvements in product design that promote environmental sustainability.

You may know the State of California via Cal EPA agencies like the Department of Toxic Substances Control and the California Integrated Waste Management Board (CIWMB), are increasing pressure on local governments to solve solid waste problems at the back-end – after products have been poorly designed and many times contain toxic materials and cannot be recycled. In fact, many products were designed for disposal. The cost to manage the waste stream at the back-end is increasing significantly along with waste volumes.

As demonstrated by the graph in our brochure (attached) between 1997 and 2006, California's waste generation increased from just over 50 million tons to a staggering 90 million tons per year! The increased volume is not purely due to population increases, but to how products are designed – they are increasingly designed to become obsolete and be disposed instead of repaired or recycled. With increasing volumes of waste comes increased shipping and landfilling which increases green house gas (GHG) emissions.

CPSC has adopted Framework Principles of Product Stewardship Policy (attached) jointly with the Northwest Product Stewardship Council which supports the CIWMB's adopted Extended Producer Responsibility (EPR) Policy Framework that we want to become legislation in 2009. The California Air Resources Board (CARB) can play an important role in making that happen by researching and providing a complete analysis of the relationship between making product producers responsible for their product waste and source reduction of the volume of waste which automatically equates to a reduction in GHG emissions. Source reduction, which is highest on the State's waste management hierarchy, is virtually overlooked in the current draft of the Scoping Plan. If there is less product and

packaging volume and more recycling, there will be less shipping and landfilling and therefore reductions in CO2 from transportation and methane from landfills.

We urge CARB to include in the Scoping Plan existing data on the connection between GHG emission reductions associated with EPR and to look to experts in the Federal EPA and in the British Columbia provincial government as they are already collecting data on this issue. We also encourage CARB to include in the Scoping Plan a recommendation of the implementation of CIWMB's EPR Policy Framework as an important way to reduce GHG emissions.

Sincerely,



Rob D'Arcy, Chair
CPSC Board of Directors

Attachments:

- CPSC Product Stewardship Framework Principles
- CPSC Brochure