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LEGISLATIVE TASK FORCE

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July 22, 2016

The Honorable Bill Dodd
California State Assembly, 4th District
State Capitol, Room 2137
Sacramento, CA 95814

RE: AB 1103 (Dodd) – Solid waste disposal: self-haulers – OPPOSE UNLESS AMENDED

Dear Assembly Member Dodd,

The Solid Waste Association of North America (SWANA) is the world's largest association of solid waste professionals (over 8,000 members). SWANA's California chapters represent more than 900 members. SWANA is committed to advancing the practice of environmentally- and economically-sound management of municipal solid waste. SWANA's California Legislative Task Force (LTF) is responsible for representing the California Chapters on legislative and regulatory issues.

SWANA regretfully **OPPOSES AB 1103, unless amended**. The bill in its current form contains broad language that is of concern to SWANA. Specifically, we take issue with the inclusion of the words "at a minimum" in the definition of "self-hauler" being added to Section 41821.5(b)(2). As written, that phrase would apply this bill to the entire definition of a self-hauler, not just those that haul the amount of food waste that meets the threshold, as this bill intends to address. We request that the words "at a minimum" (page 3, line 15) be deleted from the bill.

This broad definition is problematic because it could have unintended consequences. The bill expands CalRecycle's latitude, allowing the possibility of transferring reporting requirements from self-haulers to solid waste facilities. These potential interpretations and impacts have not been given serious deliberation, and could have unfair and unintentional effects on our facilities and on the ability of local jurisdictions to comply with state diversion mandates.

AB 1103 in its current form is too broad, and thus will result in impacts that get away from the bill's intent. For these reasons and more, SWANA regretfully **OPPOSES AB 1103, unless amended**. Thank you for your consideration.

Sincerely,

Jason Schmelzer
SWANA Legislative Advocate