



February 23, 2018

Ocean Litter Prevention Strategy Planning Team

Ocean Protection Council

1416 Ninth Street, Suite 1311

Sacramento, CA 95814

Submitted via e-mail to oceanlitterstrategy@resources.ca.gov

Re: SWANA Comments on the revised draft California Ocean Litter Prevention Strategy

Ocean Litter Prevention Strategy Planning Team,

The California Chapters of the Solid Waste Association of North America (SWANA) represent much of the publicly-owned and -operated solid waste management infrastructure in the state and the local governments responsible for implementing waste diversion and recycling programs. The SWANA Legislative Task Force (LTF) represents the California Chapters on legislative and regulatory issues in California.

The SWANA LTF appreciates the opportunity to provide comments to the Ocean Protection Council (OPC) on the Revised Draft (January 22, 2018) of the “California Ocean Litter Prevention Strategy: Addressing Marine Debris from Source to Sea” (hereafter, “Draft Strategy”). The SWANA LTF welcomes the emphasis in the Draft Strategy on source reduction and prevention, and agrees with the text on p. 20 of the Draft Strategy indicating that these are the preferred methods for dealing with waste whenever possible. In particular, the SWANA LTF supports the emphasis on extended producer responsibility (EPR), whereby manufacturers are assigned some of the responsibility for managing the end of life consequences for some consumer products. Accordingly, it makes sense to focus on reducing single-use products and packaging that frequently become litter and pollute waterways as a high priority in the Draft Strategy. In adopting an EPR policy approach, it is important for OPC to emphasize that the goal is to prevent the production of packaging and products that become waterborne litter and to hold producers responsible for financing the cleanup of trash that does end up in waterways.

In terms of the Goals and Objectives identified as OPC priorities in the Draft Strategy, the SWANA LTF supports the priority objective under OPC Goal 1, which emphasizes advancing source reduction efforts through policy, research, and funding to prevent the production and consumption of common ocean litter items through a specific list of actions. It will be particularly helpful to implement Action 1 under the “Research and Funding” heading, which focuses on conducting assessments of policy effectiveness to determine whether the policies are acting as intended, and what, if any, changes are needed to increase effectiveness. Often in state policymaking this step is missing and, as a result, opportunities to refine and improve policies and programs are missed.

LEGISLATIVE ADVOCATES

Jason Schmelzer and Melissa Immel

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Similarly, under the Goals, Objectives and Action Items identified as Stakeholder Priorities, the SWANA LTF supports many of the Action Items under Goals 1 and 2, which incorporate source reduction and EPR approaches for a variety of items and products. We also strongly support objective 5.2, which aims to educate consumers about the sources of ocean litter in order to drive behavior change in purchasing. A well-publicized and sustained statewide educational campaign is needed in order to substantially affect consumer behavior, and State leadership, coordination and funding is needed to implement such as campaign. State-led public education campaigns on energy conservation and water conservation may be able to serve as examples of what could be done, and may provide valuable lessons learned. OPC and its partners have the opportunity to develop and implement such a campaign through the Draft Strategy and we recommend this objective be included as part of OPC's Goal 1, as well as in the Stakeholder Goals and Objectives. This objective can also be used to support the implementation of many of the other objectives contained in the Draft Strategy in order to increase public awareness and drive both behavioral and policy changes.

Thank you for the opportunity to provide comments on the Draft Strategy. We look forward to reviewing the final draft of the Strategy later this spring.

Sincerely,

A handwritten signature in cursive script that reads "Melissa Immel".

Melissa Immel
Legislative Advocate
Shaw / Yoder / Antwih, Inc.

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