



June 25, 2012

Caroll Mortensen  
Director, CalRecycle  
Post Office Box 4025  
Sacramento, California 95812

**Subject: SWANA Comments – “California’s New Goal: 75% Recycling”**

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Dear Ms. Mortensen:

The Solid Waste Association of North America (SWANA) is the world’s largest association of solid waste professionals (7,700 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. The LTF appreciates the opportunity to comment on CalRecycle’s May 9, 2012 document entitled “California’s New Goal: 75% Recycling” (CalRecycle’s Plan).

This new goal represents a fundamental change in how solid waste management will be graded and enforced in California. If implemented according to the plan, jurisdictions would no longer be judged by diversion from landfills. Instead, only increases in recycling and composting will matter. Waste-to-energy and the use of greenwaste as alternative daily cover would be considered a disposal activity, thereby undermining their financial viability. The LTF is concerned that CalRecycle’s plan would negatively impact the existing diversion infrastructure chosen and financed by local jurisdictions in favor of state-prescribed technologies. New facilities are extremely difficult, costly, and time-consuming to site and permit in the California. Therefore, existing infrastructure that has brought California to this level of diversion should be safe-guarded, and not undermined.

In March 2010, the LTF proactively issued a white paper outlining the tools necessary for California to achieve greater diversion. The white paper entitled, “Achieving Greater Waste Diversion in California: Fundamental Strategies and Essential Tools,” discusses:

- The role of product stewardship in source reduction
- The need for a lifecycle analysis to fully understand the benefits and disadvantages of diversion options
- The importance of market development for recovered materials and recyclables
- The use of new technologies for the production non-fossil fuels and renewable energy and the importance of eliminating barriers to their development and use
- The need for a clear and consistent definition of organic waste in order for regulations or legislation to accurately target the compostable fraction of solid waste for diversion
- The need to provide broad discretion to local government, which bears responsibility for protecting public health and safety and managing waste, so that local government may implement locally-appropriate programs
- The need for adequate funding at the local level
- Recognition that, until and unless “zero waste” occurs, landfills will continue to play a necessary role in solid waste management

The principles upon which the white paper are based, and that the LTF believes should also be the underpinnings of CalRecycle’s plan, include local jurisdiction discretion, source reduction and product stewardship, and provision of a set of diverse set of tools from which to develop cost-effective diversion programs.

The LTF believes that the tools outlined in the white paper are not adequately reflected in the CalRecycle Plan, and we have attached our detailed comments for your consideration. We would welcome the opportunity to discuss our comments with you.

Sincerely,

A handwritten signature in black ink that reads "Lisa F. Wood". The signature is written in a cursive, flowing style.

Lisa F. Wood  
Chair, SWANA Legislative Task Force

Enclosed: SWANA Comments- “California’s New Goal: 75% Recycling”