



**SWANA**<sup>®</sup>

SOLID WASTE ASSOCIATION  
of North America

**CALIFORNIA CHAPTERS**

FOUNDING

SIERRA

GOLDRUSH

**LEGISLATIVE TASK FORCE**

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**RE: Architectural Paint Recovery Program**

The Solid Waste Association of North America (SWANA), the leading association of solid waste professionals in North America with over 8,000 members, is committed to advancing the practices of environmentally and economically sound management of municipal solid waste. On behalf of their California Chapters, I thank you for the opportunity to comment on proposed regulations on the Architectural Paint Recovery Program required by AB 1343 (Huffman, 2010).

**Recovery Program**

A key objective in AB 1343 is the establishment of an architectural paint recovery program that requires manufacturers or their designated stewardship organization to implement a program to collect and process postconsumer paint. The result should be reduced costs for local governments and a shift of cost and responsibility to manufacturers and consumers. CalRecycle's Extended Producer Responsibility Framework holds that stewardship programs should maximize convenience to consumers, require minimum local government involvement, and be adequately funded. Where allowed by statute the proposed Architectural Paint Stewardship Program regulations should be revised and expanded to be consistent with CalRecycle's EPR Framework.

**CalRecycle EPR Framework**

Where consistent with the requirements of AB 1343, the proposed regulations should establish a recovery program that is consistent with CalRecycle's EPR Framework. The proposed regulations should include framework policy goals, guiding principles, roles and responsibilities, and governance, and minimum recovery rates.

**Collaboration with Local Governments**

The proposed regulations contain only minimal requirements for manufacturers and/or stewardship organizations to work collaboratively with existing local government collection programs. Stewardship programs should be designed as stand-alone ventures that are dependent of local government involvement. A stewardship plan that relies on existing local government programs should include a copy of the signed agreement with the local government prior to be approved by CalRecycle.

Finally, CalRecycle should modify the proposed regulations to allow and consider local government involvement in the review and approval process.

We appreciate your consideration of these recommendations in the development of your Architectural Paint Stewardship Program regulations.

Sincerely,



William Merry  
Chair, Legislative Task Force  
Solid Waste Association of California, California Chapters

cc. Mark Leary, Acting Director, CalRecycle  
Assemblyman Jared Huffman