



June 27, 2013

Caroll Mortensen, Director
CalRecycle
1001 I Street
Sacramento CA 95814

RE: Carpet Stewardship Plan for California – Reject Plan/Demand Greater Recycling

Dear Director Mortensen,

CARE's revised Carpet Stewardship Plan for California (May 31, 2013 version) has again fallen short of the spirit and intent of enacting Assembly Speaker Perez's AB 2398.

We ask that CalRecycle reject the CARE stewardship plan, and demand an updated plan that supports a greater commitment to recycling. Our primary objection is the Plan continues to propose an unacceptably low recycling goal of just 16% of generated carpet by 2016 despite demonstrating a 16% recycling rate during the last quarters of 2012.

Unlike many other 'problem' products and materials, most discarded carpet is already either separately collected or relatively easily pulled from the commercial or self-haul waste stream. The continued failure of carpet recycling in California is primarily due to factors that could be solved by a more aggressive effort on the part of CARE:

- CARE is proposing insufficient incentives for processing separately collected carpet (all of which can be done in-state);
- CARE is proposing insufficient incentives for utilizing the 'PET' portion of carpet (much of the market for which is in-state);
- Overall, CARE is failing to utilize funds that carpet consumers have already paid in order to support a robust carpet recycling program in California.

Rather than investing in California recycling and jobs today, we are concerned that CARE has used consumer recycling funds to build a reserve totaling \$4 million today, with plans to increase that reserve to \$8 million – this in a program that proposes to spend just \$2.5 to \$3.5 million per year on recycling through 2016. This accumulation of consumer recycling funds has the potential to undermine public trust in this recycling program.

A key goal of AB 2398 is to “incentivize the market growth of secondary products made from postconsumer carpet”. Carpet cushion appears to be an ideal candidate for support as this would

help address the PET issue and help create additional jobs in remanufacturing. While CARE's stewardship plan suggests they "may" make payments under the Discretionary Incentive Fund, we believe that current market conditions and opportunity demand a commitment to this incentive payment as a condition of plan approval. Our survey of in-state manufacturers indicates that they could utilize all the PET fiber generated in this state to make carpet cushion and increase employment by 200 or more workers if there was adequate incentive.

We look forward to working with you and your colleagues on the successful implementation of this important program.

Sincerely,

Mark Murray
Executive Director
Californians Against Waste

Heidi Sanborn
Executive Director
California Product Stewardship Council

Annie Pham
Policy Advocate
Sierra Club California

Tim Dewey-Mattia
Public Education Manager
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Karen Keene
Senior Legislative Representative
California State Association of Counties

Jason Rhine
Legislative Representative
League of California Cities

cc: Howard Levenson, CalRecycle
Kathy Fervert, CalRecycle