

November 1, 2017

Cynthia Dunn
Supervisor, Extended Producer Responsibility (EPR) Unit
CA Department of Resources Recycling and Recovery (CalRecycle)
P.O. Box 4025
Sacramento, CA 95812

Sent via email to: packaging@calrecycle.ca.gov.

Re: Comments in Response to the October 10, 2017 Packaging Reform Workshop

Dear Ms. Dunn:

We at the California Product Stewardship Council (CPSC) thank you and your team for holding an informative dialogue about packaging policy on October 10th, 2017. We support CalRecycle in the endeavor to regulate and minimize packaging waste and agree with the approach CalRecycle is taking based on the policy model released for the October workshop which has producer responsibility as one of several policy tools that need to be utilized to achieve the 75% goal and beyond.

It is very important to us that the end-goal should be to decrease generation and disposal of packaging.

The following are our general comments as we know there is a lot of detail yet to be determined:

1. We support producer responsibility to reduce packaging waste and to take-it-back or ensure it has an effective closed loop management system which includes strong markets for the materials they choose to use in packaging. It is less expensive to source reduce and take-back packaging than pay for environmental clean-up.
2. For companies that lead, California can offer incentives to reduce and recycle packaging materials. Offering a regulatory off-ramp at least temporarily to incentivize companies to innovate new packaging materials and processes is important and could drive the desired activity in the private sector.
3. Whatever policy tools are chosen, we ask that they do not add more enforcement burdens on local governments which are already struggling to keep up with regulatory requirements.

Thank you for the opportunity to consider our comments. We look forward to being very involved in the packaging discussion as it continues.

Sincerely,



Heidi Sanborn, Executive Director
California Product Stewardship Council