



October 6, 2020

Robert Peoples, Ph.D.
Executive Director, Carpet America Recovery Effort (CARE)
100 South Hamilton Street
Dalton, GA 30722

Re: CARE Deliverables Extension Requests

sent via e-mail

Dear Dr. Peoples,

CalRecycle reviewed CARE's document titled "CARE Update on Deliverables and Proposed Changes to CalRecycle," which included requests to extend deadlines for 10 projects or deliverables. Upon consideration of the factors explained in the cover letter submitted with the document, including impacts caused by the COVID-19 pandemic, CalRecycle approves the deadline extensions, as indicated in the attached table.

CARE proposed to submit a revised discards formula and implementation plan (Item 2 of the 2018-2022 Plan Items) by June 30, 2021. While CalRecycle agrees with that approach, staff request that CARE begin utilizing the revised discards formula in its next carpet stewardship plan, rather than during the remaining duration of the current plan. Because updating the discards formula affects how CARE estimates carpet disposal and calculates the recycling rate, CalRecycle has decided to delay implementation until a new carpet stewardship plan is approved. Additionally, pursuant to Public Resources Code section 42972.2(b), CalRecycle shall review and may adjust the recycling rate and program goals based on information included in plans and annual reports, as well as any other relevant information. An update to the discards formula is a relevant factor that CalRecycle will consider in its review and potential adjustment to the recycling rate and program goals.

We look forward to continuing to work with CARE on these projects. If you have any questions, please do not hesitate to reach out to the carpet team at carpet@calrecycle.ca.gov.

Sincerely,

Signed by Clark Williams

Clark Williams
Chief, Statewide Technical and Analytical Resources Branch

Attachment 1: CalRecycle’s response to CARE’s extension requests

Chapter 0/Assembly Bill 729 Items

Item	CARE’s Action	Original Due Date	Revised Due Date	CalRecycle’s Response
1. Convenient Collection for Flooring Professionals – Final Report	Final Report submission to CalRecycle	11/30/20	6/30/21	Approve revised due date. CalRecycle will review and determine whether to approve.
2. Differential Assessment	Establish a system of differential assessments including definition to CalRecycle	11/30/20	6/30/21	Approve revised due date. CalRecycle will review and determine whether to approve.
3. Economic Analysis 2.0 – Final Report	Final Report submission to CalRecycle	11/30/20	6/30/21	Approve revised due date. CalRecycle will review and determine whether to approve.
4. Highest Recyclability – Definition	Expand the definition of “highest recyclability” and incentivize recycling where it is most needed	12/31/20	6/30/21	Approve revised due date. CalRecycle will review and determine whether to approve.
5. Recycling Rate – 26%	Focus on the collection of whole carpet in order to increase the recycling rate	12/31/20	No change	No response necessary.
6. Reuse	Increase Reuse Weight – 2020 Goal (1.5 million pounds)	12/31/20	No change	No response necessary.
7. Reuse Promotion	Promote Reuse on Website and provide quality/performance feedback mechanism	12/31/20	No change	No response necessary.

Item	CARE's Action	Original Due Date	Revised Due Date	CalRecycle's Response
8. Models Update (Modeling Team)	Semi-annual update	6/30/20	9/1/20	CalRecycle previously approved the revised due date, and received CARE's model update on September 1, 2020.
9. Conversion Cost Model (CCM) and Subsidy Justification Model (SJM) – Reporting Dashboard	Develop a reporting dashboard that summarizes the results of four primary models in order to demonstrate traceability of financial results to external stakeholders.	6/30/20	12/31/20	Approve revised due date.
10. Processor Capacity	Implement Capacity Study/Survey recommended program adjustments	9/1/20	6/30/21	Approve revised due date. CalRecycle will review and determine whether to approve.
11. Minimum weight of postconsumer carpet (PCC) content in products	PCC Minimum – AUPs/Guidelines established	9/1/20	No change.	No response necessary.

2018-2022 Plan Items

Item	CARE's Action	Original Due Date	Revised Due Date	CalRecycle's Response
1. Conduct Annual Weight Survey for Discards	Conduct an annual weight survey during Q3 and implement the updated figures into the denominator calculation effective January 1 st of the next year.	9/30/20	12/31/20	Approve revised due date.
2. Discards Formula	Submit revised discards formula justification and implementation plan.	12/31/20	6/30/21	Approve revised due date. Delay implementation until a new plan is approved.

Item	CARE's Action	Original Due Date	Revised Due Date	CalRecycle's Response
3. Reuse Study	Conduct a reuse study	12/31/20	6/30/21	Approve revised due date.

Annual Report

Item	CARE's Action	Original Due Date	Revised Due Date	CalRecycle's Response
1. Annual Report	Submit ADA Version of Annual Report to CalRecycle	9/1/20	No change	No response necessary.