

0:06

Hello, everyone, and thank you for coming to our third informal workshop on the IRS rulemaking.

0:14

It's around 10 o'clock right now, but we will wait a few minutes until 205, until we formally start just to give any stragglers, a few extra minutes to shop.

0:25

So with that, thank you. And we'll check in again in just a couple minutes.

4:03

Good morning, everyone. So, it is 10 and 5 and we'll go ahead and get started here. My name is Dan Brown on the manager of the knowledge integration section and the Policy Office at Cal Recycle. And I'm excited to have this third workshop. The team worked very hard to get the draft, proposed regulatory changes out last week, so people could review and have an opportunity to determine what kind of questions or comments they may have on these proposed reg language. So, Eric, who's going to take over here in a moment, is going to show everyone where those can be found if they have not already had a chance do. So, we're going to go through and provide a very brief discussion of the changes bisection, and we'll be soliciting questions as we go along.

4:49

And then, if, no, we're not going to have time to get to everything, unfortunately.

4:55

But if anyone has any comments or questions on portions of the regulations that we're unable to get to today, please send those comments and questions to the rulemaking e-mail, which, again, we should be able to share as part of this webinar. So, thank you very much, and I will turn it over to Eric.

5:17

Thanks for that, Dan.

5:19

Yes, sir, one. Sorry, I should say my name is Eric, organizing the rulemaking along with Priya.

5:24

And so let me share my screen to show you where you can find the regulations, if you haven't already seen them.

5:36

So, you should be able to see the kaw recycle.

5:42

What page in front of you?

5:45

And if you have not already found, and downloaded the regulation's, one thing that you can do is go to our search bar, and type in something like RDR S updates, and when do you search for that.

6:00

The first link here will take you to the updates to our Regulations reporting. Our Regulations page.

6:08

Scrolling down, we have an Informal Rulemaking Documents section, which has our regulatory draft text.

6:18

So, I'm just going to download that, which downloads PDF, and here is a document.

6:23

So, like Dan said, we will go over each section, just kinda give a brief overview, and then we can, you know, take questions as we go along.

6:34

To ask a question, you can either raise your hand, and then if you, yeah, that's if you want to chat, make your comment or question verbally, you can raise your hand, and then we'll be able to see that on our end, and we can allow you to unmute yourself.

6:50

Once we do that, you'll still have to click on your end to unmute yourself, Is it just, we can get, gives you that ability to unmute yourself, so you won't be able to stop talking until you take that second step.

7:03

Alternatively, you can post your questions in the questions box, and we'll just keep an eye on that as we go along.

7:13

So, with that in mind, let me just kinda zoom in a little bit here.

7:20

A little bit bigger. Oh!

7:27

And I'll just kinda go through them.

7:33

So, why?

7:35

So we already have one quick question. Yes. Thank you for.

7:40

So there's a question. Are the revisions highlighted in and struck out? Yeah, that's a great question.

7:45

I can just show you that here on the draft you should be able to see on 1815 zero point one subsection subdivision C for example, there's an underlined change here.

7:57

So underlined means a new insertion and strikeout means a deletion.

8:06

So kind of standard regulatory language syntax.

8:16

When you drop the link, sure.

8:18

Let's see.

8:23

Create another question. Can we just drop the link in the chat? I can do that.

8:28

So there's the link to the regulations in the chat.

8:32

If you want to download it right now, rather than going through the process of typing in, OK.

8:42

So in 1 8 8 1 5.1, we're not doing any, any real changes to the regulations that affect reporting.

8:50

The change that you can see here in front of you is due to a change to the Administrative Procedures Act. Which is just, it's just updating the references, so I won't kinda go through that.

9:02

That doesn't, it doesn't affect any any reporting entity in RD RS.

9:07

For our definitions, Section 1 0 8 1 5.2, as we've discussed in the prior rule makings workshops, there are kind of two major changes and the definitions more than what you can see.

9:25

Of course, there are more than two changes that you can see on the screen, but the two major changes really are that we added a new definition for collection method, which I'll scroll to in just a minute, and we added A what kind of changed the definition of, of source sector.

9:50

So, kind of scrolling through this, you can see we have some changes for alternative, daily cover and alternative intermediate color cover.

9:59

These changes are not, I'm just going to turn off my screen's on that, distracting erawan with just kinda my visuals here.

10:10

The changes for alternative daily cover, an intermediate cover, or not not substantives early, just kinda changing the wording, so, it's kind of more systematic and follow standard procedure.

10:25

Likewise, that's where you can see and beneficiaries with changes where an article to article or rather than section.

10:31

So, I'm just going to scroll to Collection Method here.

10:35

So, Collection method, we have to define collection method.

10:39

Because SB 343, of course, requires us two collect information about collection methods. So, we need to define what that is.

10:50

And, in our first workshop, we talked about how a collection method would include various things, and what we're basically saying in the regulations now.

11:00

Is that collection method includes, at a minimum, the source sector, materials stream and where the material was required to be collected or segregated for collection or receipt.

11:16

It's easiest to see it as an example.

11:17

So, for collection method, we're thinking things like contract hall, commercial, mixed waste.

11:23

So, you receive it from our contract taller, it's correct.

11:26

The source sector is commercial, and the material streams mixed waste.

11:31

Conversely, the material stream could be something like mixed recycling or source separator recycling.

11:38

So, we're not asking for no, very granular things.

11:42

No, what house it's coming from, if it's residential, it's really just residential versus commercial, kind of mixed recycling, mixed waste, that kind of thing.

11:57

We do know, however, that some entities and Ardie RS, not not every entity is going to receive material from direct all meaning from or from a contract taller.

12:10

So, if you're a transfer processor, for example, and you receive material from a recycler composter for like it's residual solid waste.

12:19

You're not going to have to figure out what source sector is.

12:23

For that residual material, it's just going to be, you received it from a transfer processor.

12:30

So, whenever Material is received, not from a contract taller, you're just going to report the reporting entity entity that you received it from, basically, under the current regulations.

12:42

We have a question from Veronica part of about when the IHS reporting requirements are expected to begin.

12:49

That's a great question.

12:51

So you can't you don't see it here in the definition section, but in our methods and elsewhere in the regulations, we've specified that most of the changes won't take effect until 20 24, Q four.

13:06

And we're doing that to ensure that we have enough time, one too, build the changes into RD or S and two to reach out to you and other stakeholders to explain what the new changes are going to be.

13:20

For the changes that take effect earlier than 2024, Q four, they don't really require any changes to your S, and they're not, they're not really requiring new reporting behavior on the stakeholder part. They're really just clarifying things.

13:39

And don't really have a regulatory effect, any, anything that's going to be a new reporting burden, or new reporting style, or just a new reporting thing, that won't take effect until 20 24, Q four.

13:53

At least half the way that we've currently written the regulations.

14:00

Have another question, instead of just the latest defined list types of

14:08

I'm Vic Mark.

14:12

So, that's a great question. Let's come back to that when we get to Section one, A 1, 5.9, which for we talk about methods.

14:21

If we forget to answer your question during the method section, please just ask it again, and we'll come back to that.

14:28

And we have one more question from Kathy Garcia. Does definition need to caption?

14:35

T O T W can see much of what that is, excellent methods.

14:42

Can you clarify what you mean by POD GW?

14:48

Yes.

14:53

Wastewater treatment plants, right?

14:56

So, one of the things that we are going to do as we implement these regulations, is, you'll notice that collection method does not specify all of the different types of possible collection method that occur. Just because, you know, we can't envision all of the types that could ever occur.

15:18

So, we're trying to leave the regulations general, and then, once we start getting into the implementation phase, we'll be reaching out to stakeholders like yourself to figure out what no, really the exact collection method options should be.

15:36

For wastewater treatment, even though it's not in the examples here, we were envisioning we would have a wastewater treatment example, but it might not necessarily require CIB.

15:48

The source sector component might be like residential slash commercial, you know, because it might not really be possible for wastewater treatment facilities to discriminate between residential versus commercial wastewater that's coming in, though, if all of those facilities tell us, it is possible, then yeah, we might want them to say like this is residential wastewater, or this is commercial wastewater coming in.

16:17

It's.

16:31

OK, so to keep going through the methods, since we only have two hours, just to kinda highlight some of the big ones here.

16:43

We have a new definition for export, because AB 881 requires us to collect jurisdiction of origin information for export of materials.

16:56

The main highlight for the export definition, is that the export is really talking about where the material is taking control of, so if you send material to, for example, a broker transporter. But that broker transport or operates in California that's not going to be considered export from the purposes of

17:20

The materials only export it once it's finally sent out of country.

17:24

So the broker transport, or if they're the one who arranges for that material to be exported out of country, then they would be the one. Who is considered to have export material? Not you as the person who has sent it to the broker transporter.

17:45

Keep going.

17:47

Let's talk about mixed plastic waste. Again, this is also for AB 881.

17:53

The main highlight here is that AB 881 defines mixed plastic waste as anything that is not plastics 1, 2 and 5 solely.

18:03

So we're basically just replicating that definition.

18:08

So anything that's a mixture of plastics, that's not only 1, 2, and five, it's going to be, quote, unquote, plastic waste.

18:17

We're also adding a definition.

18:20

Sorry to interrupt.

18:21

There's one question, from Latin sweetsir, On, While 10 point site collection method, many loads are mixed.

18:33

Can you repeat that question?

18:35

Question On Y zero point five, collection method, many loads are mixed.

18:43

Zero point five, I don't really understand with that question means mixed loads.

18:51

I'm sorry, Larry, can you rephrase that?

18:55

Oh!

19:05

Yeah.

19:12

Yeah.

19:18

Larry, you're also, um, you can you're unmuted. You can chat if you want to see your question. Yeah.

19:26

OK, yes, we're going to get through So, Collection method, sometimes they're examples, contractile, commercials, mixed ways, contract called residential. Sometimes they're all in the same truck.

19:39

Are we going to be able to use the maps, it's later to aggregate them by a percentage rather than for vehicles or other reports?

19:49

Yeah.

19:50

So, if you're receiving contract haul, residential and contract hauled, solid waste all in a mixed truck all in the same truck.

19:58

Oh.

20:02

I would hope that the contract haller, Nos, information about like, what percentage of materials are from like, residential versus versus commercial? Because, otherwise, I don't know how you would be reporting accurately an RD or S as it is currently.

20:22

Well, it's estimated. And they usually aggregate over multiple vehicles.

20:28

Percentage numbers. So that'll still be allowed through this, what is the use of this term.

20:33

Yes, the way we've currently written the regulations, is five tons.

20:39

So you would have to multiply those percentages out by the um tonnage Inflow that that you got from the contract taller.

20:49

We have a calculator.

20:53

Excellent, thank you.

20:55

We have a question from Edward Boysen: My apologies if I'm not pronouncing your last name correctly.

21:03

I don't think these draft regulations include newly defined material types and forms will also be defined later.

21:13

Yeah.

21:14

So again we can come back to that in the methods section but um, so I'll just cover that briefly.

21:21

Now The new updated regulations don't really provide a definition for material type versus form because our definition of material is really an amalgamation of both type and form so what we're going to do is to update our material types whist.

21:45

So an RD or S when you have to report the material type you know, you can search and select any of different material types in the list.

21:53

So we're going to update that list of options that people can use two more to better discriminate between type and form. Since R.

22:06

List right now is sort of a mixture of both type and form.

22:09

So we're just going to try to update that list to make it more internally consistent and better able to discriminate between type and form.

22:22

Could you answer, when will that list be developed?

22:26

So I can't say, when, specifically, we're going to develop that list, you know, because we have to get through the regulatory stage, regulation's first.

22:35

And then once we start developing that list, you know, we will follow the same procedure that we followed.

22:40

When we first started already arrest development.

22:44

You know, which I'm sure included reaching out to, I publishing initial drafts of the lists to get feedback from stakeholders on, like, Is this a reasonable material type, for example.

22:57

We also have a follow-up question from Levy on 25 point size, how do we wastes from tribal lands?

23:06

Yeah.

23:10

In terms of collection method.

23:18

I'm not sure of the question, just as the base from Can you clarify your question or you're not a collection method question.

23:29

New definition for export indicates that for purposes of this article, tribal lands within the state, or tribal holdings of the United States will not be considered outside the US.

23:42

How does that fit into the system when facilities are loads from tribes and not sending their tribes?

23:52

Well, so that's, I think you're talking about two separate things.

23:55

one is that if you are reporting disposal on Tribal land, that is referred to as normally particular report the inflow from your tribal land and you would report the jurisdiction as as a tribal land.

24:12

But if you're exporting, quote unquote, exporting, you know, sending material to a tribal land for the purposes of this, um, article, just saying tribal lands.

24:25

Don't, don't count.

24:28

Says export, basically.

24:32

And so if you were, if you were sending no and used to a tribal land, you would, you would just report end use as as normal.

24:42

None of our materials stream's really rely on kind of this export definition except for mixed plastic waste.

24:58

All right, so that's export. You might notice there's a change to government entity here.

25:08

Wow, there's a lot struck out.

25:09

It's really just a non substantive change, really, just kind of rewriting several things in the regulations to be more consistent based on kind of where our legal office is telling us.

25:24

So, let's scroll through. We talked about mixed plastic wastes. I mentioned the mixed plastic mixed waste organic collection stream.

25:33

I'm wondering, Priya, if you can mute yourself.

25:42

Next Waists organic collection stream.

25:45

We've added that because the search Unity reregulation reference that.

25:51

So we're not really changing the regulations right now for the organic collect stream or just adding it. So there's definition there. So that's not really a big change.

26:02

And let's keep going.

26:04

So one of the things that we've done is to add, we've defined solid waste information system or Swiss. And that's because later on, in the regulations, I'll mention, we're now going to be asking entities to provide their Swiss number if they have one.

26:19

Right now, currently, that's optional.

26:22

But the new regulations will require that, Only if you have a Swiss number, though.

26:26

If you, if you operate a facility that's not registered in Swiss, and it's not required to be registered in Swiss, then, you know, this, obviously, you have nothing to report, so that doesn't apply to you.

26:38

The other main change that I mentioned a few minutes ago regarding source sector, That's kind of the other big definitions change, um, is that source sector, we're now going to be asking you to split self hall into commercial versus residential components, which I'll get to in the methods section, about how we're going to do that.

27:03

And, any entity that you receive material from, that's not a contract taller or a transfer processor, it's just going to be designated as such. Currently, our regulations specify that.

27:17

If for example, a landfill receives material from a recycler like residual solid waste, the landfill would consider that self hall, But that's not really what that material is.

27:29

That material has an unknown source sector, So that's really what this edition.

27:34

We're adding a new category, which is effectively going to be an unknown source sector.

27:39

But, you know, we're just going to use a long name.

27:42

We're going to call it reporting entity other than contract taller, or transfer processor.

27:47

So, we're trying to get more granular information about source sector and to kind of clarify when things are actually unknown, since right now, it kinda gets mixed in.

27:59

So that's 1015 zero point two, 1 8 1 5.3.

28:05

Let's see.

28:09

The main changes, I would say, go section notes here.

28:20

So in 18815 zero point three, we are clarifying several things about registration and reporting.

28:30

There aren't really too many substantial changes to 1 0, 1, 5, zero point three.

28:34

People are really mostly behaving in the ways that the regulations were meant to say, but we kind of realized that the regulations could be rewritten to kind of clarify that.

28:45

So, that's what we've done in 1 8, 1 5.3 is really added a number of clarifying.

28:51

language components, not not really changing things too much, but I'll go through it, and I'll point out the changes.

28:58

The first thing, and I'm just going to skip over the changes that are non substantive. Like, for example, we've struck out the word subdivision here and just changed it to division.

29:09

So, I'm just not going to go over that kind of stuff anymore.

29:13

So, we have a section in 1 8 1 5.3, that lists the entities who are not required to report who are exempt from ... reporting.

29:23

We have added a line that explains that brokers and transporters who take control of material outside of California are exempt and that's because they're out of California facilities. Right.

29:35

We can't regulate entities that exist and operate outside of California, and no, they were never really required to report anyways, this is not really a big change, we wanted to have that in there.

29:51

Then, we've made a number of changes to 1815 zero point three D, which explains how sites with multiple activities need to register and report an RD or S.

30:05

The main change is to Paragraph or here where the goal is to explain that facilities basically need to look at the sum total of all of their activities on their facility, when they determine reporting. And so, there are two components to this.

30:25

one is that if a facility operates like a single reporting entity activity, you're not really supposed to be splitting that reporting entity activity arbitrarily into different reporting entities and Ardie arrests. Just say that each one is below the reporting thresholds.

30:43

You need to look at that reporting entity as a whole to evaluate reporting thresholds.

30:50

Likewise, if you're, site, itself, has multiple reporting entities all with the same operator, if any one entity is above reporting thresholds, and you actually should be reporting for all entities on site.

31:02

Because we really need to have A like a whole picture of the activities on the site, you know, it can be misleading for reporting if you're doing a lot of other things, and we only have the one entity.

31:15

Book Forwarding Paragraph seven is really targeted towards your cyclor composters this is just saying that.

31:24

If a recycler composter chooses not to report together with their parent transfer processor or disposal facility, they still need to report separately.

31:35

Just kinda clarifying potential.

31:38

Not loophole, but, you know, something that people might misinterpret in paragraph Andy originally.

31:47

And Paragraph F here.

31:49

It looks like we've made a lot of changes.

31:51

You know, there's a lot of new text, but the basic gist of paragraph F is that entity is really just need to start reporting.

32:03

As soon as they are subject to reporting requirements, So, currently in our regulations, without all these changes, when an entity becomes subject to your reporting an RD or S, They are allowed to start reporting the quarter after.

32:21

And, you know, we've decided there.

32:22

They should really begin reporting in that corridor in which they become subject.

32:27

But, as I noted earlier, we do have, whenever there's a new reporting requirement, we're, we're not starting this until October 1, 2024, because, you know, it's not really reasonable to kind of backdate this regulatory change, too preexisting entities.

32:54

So, continuing on, we have G and H and 1815 zero point three.

32:59

These respectively, are dealing with changes to and activities, Status, so, entities can request to become inactive, closed, or exempt.

33:12

An RD or S and G and H are really just clarifying that process.

33:19

So, it looks like we've added a lot of new language, but generally, we're just clarifying that when you request to become inactive, or exempt or closed. You have to justify that to the Department.

33:30

And the existing regulations weren't clear in all system scenarios, where you had to justify, so he said, basically, whenever you make any change, any request, you have to justify that.

33:41

And kind of the most important change here is that we're not going to backdate requests.

33:47

So if you become exempt today, you really can't tell us two years from now, and expect us to exempt you for those two years where you didn't tell us, Because you're supposed to tell us basically immediately, or within 30 days, whenever you have such a change.

34:09

So, if you become exempt or inactive, or your whole site closes, you should tell us as soon as you can, because we're not, we're not going to backdate those requests.

34:23

Let's continue on, too, N.

34:27

So, the main change in end here, and as originally dealing with how entities are responsible for the information there.

34:37

And their reports were mainly just clarifying that if the department or an entity identifies an error, you need to do something about that within 10 days. Previously, it was a little unclear.

34:52

The wording was unclear because we said, you have 10 days plus an additional 14. it wasn't clear whether it was 10 or 24? So we're just clarifying your 10, 10 business days specifically unless the department has granted you additional time.

35:11

It looks like there's a question what time we'll be talking about SB 343.

35:16

Um, what kind of get to that as as we go along and the regulations?

35:23

It's like there's another question within 10 days of discovery.

35:27

So paragraph two is really talking about when the department notifies you, so if we have notified you, You have 10 days to do something about it within that notification.

35:38

On the other hand, there are other regulations continuing on just, and P, P basically, if you discover it on your own, you should do something within 10 days.

35:53

Right, item two.

35:59

Yeah, so I did too, is about if the department notifies or if the reporting entity identify identifies inherits. It's either.

36:18

I see your comment, Carlo's, Thank you for that.

36:20

We can look at that in the regulations.

36:26

So we're about halfway through our first hour. I'm sorry, I think I need to speed up a little bit to get through more of the kind of bigger stuff.

36:33

So in Q here, Q is not really Q is an entirely new subsection, but it's not really requiring anything new except for one thing which I'll note.

36:44

So Q is just clearly more clearly specifying the process for registration.

36:49

For example, some sites have registered multiple facilities that are at different addresses within difference within the same site.

37:00

And the way already IRS works is we can really only have one physical address or site. So that's what these regulations are mostly clarifying.

37:08

If you have multiple facilities that are at different sites, different physical addresses, should be different sites within our DRS.

37:18

And the new registration requirement is just sweat requiring swift number, which I mentioned earlier, and we're requiring Swiss number mainly because we often get public right Records Act requests and internal requests from others for data organized by Swiss number. So it will be ...

37:35

the data that already are as contains will be much more useful for stakeholders and internal staff if we can really have as many Swiss numbers as possible associated with the RTOS IDs.

37:50

OK, so reporting requirements for haulers There was a question earlier about when are we going to talk about SB 343?

37:57

Well, that's probably SB 343 will apply to kind of each of the reporting entity sections.

38:02

So I'll talk about that as we go.

38:07

This first little bit here is really just about self haulers.

38:11

And the goal there is to just say that if a self haller is delivering to a reporting entity, that reporting entity has the authority to request information from the self hauler.

38:21

Like the self holler has to give you started out collection at them, you know, where where is It from, which includes the SAR sector, residential, commercial, that kind of thing. There's not really a change there's just increasing the amount of information itself haulers are providing to your reporting entities.

38:38

Contract hollers, they are still, they have the same general reporting requirements as they currently do, which is that for contract haulers that send Material two in State reporting entities. They don't report an RD or S Instead.

38:55

They just report to the reporting. They give information to the reporting entity.

39:01

And of a contract toddler is hauling tons to land application in-state, or two times out of state. Then they have to report and ...

39:11

for the tons that contract haulers for the information that contract dollars get your reporting entities.

39:17

We are updating the information that they have to provide so that those reporting entities can provide information required by SB 343 and AB A one.

39:30

In particular, Contract toddler's originally were only required to provide jurisdiction of origin for solid waste And we're expanding that to basically include any material. So solid waste, green material for beneficiary use, mixed plastic haulers need to give the origins for that material to the destination reporting facility.

39:53

They also need to provide source sector, of course, for solid waste. That's not a change.

39:58

And they need to provide the collection method through which the material was received. So.

40:05

Larry Sweetsir facility it gets, uh, material from a contract taller, the contract tolerable need to provide the collection method.

40:18

Question Some parameter parlance. A jurisdiction's expected to reflect self expectations in a local audience.

40:28

I would say no, but Dan, if you have any other thoughts on that please chime in.

40:36

Yeah, I think it's a short answer but that's correct. Nothing in this would require a local jurisdiction to establish ordinances for self haulers.

40:47

Basically any there's already requirements for how facilities should collect information from the self hall sector, and so that remains how that information may be collected.

41:03

Excellent, thank you Dan.

41:05

So continuing on with self haulers are contract dollars, excuse me, the other main change or contract haulers.

41:13

There are two other, excuse me, two other main changes in their ...

41:17

in the reports that contract towers submit to the department, not too the information that they give to your reporting entities. So these are tons sent out of state.

41:27

Contract haulers will need to provide a collection method so like any other reporting entity they will be required to provide collection method but you know only when they send out of State.

41:39

And contract toddlers' will also have to provide the jurisdiction of origin for mixed plastic waste tons that they export out of State.

41:50

So, it's probably won't happen too often, so it's not relevant for most of the people on the call.

41:55

The contractors who export mixed plastic waste will have to report that an RD or S Notice there's a big strikeout section for reporting.

42:05

When reporting is do, we just move that elsewhere in the regulations for organizational purposes. So that's not a big change.

42:13

All right, let's talk about transfer processors.

42:17

The first main changes you can see here, we've added a new, like paragraph chunk of text, too.

42:28

The transfer processor Inflow section.

42:31

And without kind of reading out what that text is, the basic goal of this point here, is to accommodate situations in which transfer processors have to send material, two specific destinations.

42:48

So, you might have this situation where a transfer processor, like X, is sending tons from jurisdiction one to landfill one and jurisdiction and tons from jurisdiction to to landfill too.

43:02

RTOS can currently accommodate that situation just fine, but, if the transfer processor doesn't receive those tons from Direct Hall, if they received the tons from like another transfer processor, then RDS can't handle that.

43:16

That reporting scenario and entities had told us that, they've asked us how to report, and we haven't had a good answer.

43:23

So we're modifying the regulations to essentially allow that reporting by allowing the transfer processor needs to send the tons to landfill to report the inflow as direct haul.

43:36

So that's a very that's a very specific change.

43:38

I won't go into the details there. Any more than that, just because that won't apply to many people.

43:43

But the main changes that will apply to more transfer processors is that four tons that a transfer processor accepts.

43:51

Other than disposal for purposes other than disposer beneficial re-use, you'll have to report the total tons by collection method.

44:03

And we're not asking you to report material type that's important.

44:07

So you won't have to, you know, look into the Bins that are coming from the contract taller and say, well, 100 tons of recyclables were from mixed recycling and 100 tons were from starts separated.

44:18

Now, it's just it's just going to be by collection method.

44:22

What are the tons for each of this collection method?

44:25

And it's also not going to be by reporting entity.

44:30

So if you receive as a transfer processor, if you receive tons from two separate source transfer processors, like

44:40

two inflows and your inflows table one, you won't need to report the collection methods separately for each of those inflows. It's just all going to be aggregated across all of your inflows.

44:52

And we're doing that, because we thought that would be sort of less burdensome for the stakeholders. It's just eat.

44:58

And it'd be Lester Report and RD RS.

45:00

And we don't really think we need that really granular information about collection method from specific reporting and any sources.

45:14

OK, so let's keep going to the next kind of big change here.

45:26

So the next big change, notice we've made some other additions here, these aren't really major changes. For the broker. You notice there's a line here about the rubber transporters.

45:38

That's again, because we're now discriminating between broecker transporters who send material who take control of material outside of California versus who take control inside of California.

45:51

So if you're sending to a broker transporter who TACE control outside of California you're effectively sending that material outside of California's sending it beyond the state's jurisdiction and in that case.

46:06

Now, treating that as, you know, effectively that's, that's sort of left. So, we're not going to require the reporting entity destination in that scenario, instead, it's just going to be by region.

46:16

So, if the broker transport tastes control in Nevada, you would report Nevada rather than the specific broker transport or who you're sending to.

46:26

We've done sort of that that change in each of our reporting entity sections.

46:31

So for each of transfer crosser, Transfer processors, disposal Entities, Recycler composters, and so on whenever you send a Tube Robert Transport or takes control out of California, you're just going to be reporting material by region.

46:46

So I won't go through those changes for as other sections. It's just the same for each of them.

46:51

Coming back to transfer Processor's, though, specifically, the one new reporting change.

46:57

There's some other changes up here in paragraph three, but those aren't really substantives.

47:03

The main changes, next plastic waste, So, again, this is the same as contract toddler's, whenever you send material, send mixed plastic waste material out of country if you've exported it.

47:16

You'll have to report the tons by jurisdiction of origen.

47:21

We'll also be asking you to report the tons by the destination region, so if you have next plastic waste export, you might be reporting as something like this, went to him, went to Thailand.

47:35

It was mixed plastic: waste composed entirely of mixed plastics 6 and 7, and it all came from Davis California. So you would report that.

47:49

And this is going to be the same for all of our reporting entities as well as well.

47:53

So contract toddler's, who export tepees, who export disposal facilities, recycler, composters, proper transporters, any reporting entity who sports mixed blocks, plastic waste.

48:05

We'll have to report the same level of detail information in our ERS and it's basically the same language in each section.

48:14

Simon go through that.

48:21

All right.

48:21

We've made some changes to paragraphs, D, and E These really refer to the searching 83 regulations, and we're not really changing anything here.

48:34

We're just clarifying that what material should really be reported, which people have been reporting correctly.

48:41

But there are some just oversights in the writing of the language. So that wasn't clear. What should actually be reported.

48:48

For example, Paragraph two B says that material that is recovered from the source separated should be reported. But Section 1, 1, 7, 4 0, 9.5 point 1, you know, blah, blah, blah. This is really talking about material that's removed and essentially disposal. So that's what we're clarifying here.

49:09

And people have been reporting the disposal because that's what 17409.

49:13

D two says. Oh, we just wanted to clarify that.

49:16

So that's not really a change to an increase to your reporting and ERS just clarification.

49:23

And he is referring to how the department calculates recovery efficiency so that doesn't affect the transfer process or reporting entity reporting in any way.

49:35

It's just how the department will calculate the recovery efficiency rate without going too much into the details of it.

49:45

The original regulation's basically said we would average the recovery efficiency from each quarter.

49:52

But, if the recovery efficiencies for each quarter are based on different total tons, like, if Q one as one thousand tons in Q two, as 100 and Q three, as 300, that wouldn't appropriately really reflect, reflect the recovery efficiency.

50:07

So, instead, we're going to be doing it based on the total tons received across the quarters, not looking at averaging the raw percentages.

50:17

And that's the same for F, just sort of sector separated rather than mixed solid waste or mixed organic waste, excuse me.

50:27

The last main change for transfer processors in H is that we are requiring Transfer Processor's now to provide information to reporting entities rather than to the department.

50:44

And this is mainly, this is partially for the goal of what I mentioned earlier, about allowing transfer processors who send material to specific destinations to report those origins.

50:56

And in order for this to happen, the sending transfer processor would need to send along the origins to the transfer process, or who is actually saying that to

51:06

So that's what we are adding here in the regulations in paragraph one if the destination facility requests the origins than the transfer process or you should provide them to the destination.

51:20

So it's only going to be if requested here for this paragraph one.

51:24

Um and likewise paragraph two is a similar idea but it's basic.

51:30

It's for materials sent to your recycler composter or a trance processor.

51:36

You need to provide the jurisdiction of origin if requested.

51:40

And the reason we're doing this is because some facilities have total cow recycle that they receive.

51:48

materials for processing from jurisdictions that are reasonably far away from there.

51:54

Their facility, and they generate residuals from that processing.

52:00

Now, the way that already IRS regulations currently work is that those regulations have to be host assigned to the facility that did the processing.

52:11

The facility has told us, Well, that's not really accurate because you know, we exist in Davis, for example, but we're getting tons from um, no Humboldt's not really a real example, but it's just somewhere Humboldt as far away from Davis.

52:27

So what we are doing is we are allowing the destination facility and Davis to request the origins information from the recycler and humble.

52:36

So that Davis can appropriately assign the origins for the residuals that it generates, so they're just, it won't have to rely on host assignment if it doesn't want to.

52:50

But what paragraph three is saying is, despite really paragraph 1 and 2, for mixed plastic waste that you send, you need to, you have to provide the jurisdiction of origin because facilities have to have that information.

53:05

Um, because mixed plastic waste, as required by AB 81, requires jurisdiction of origin, So it's not only if requested by the destination facility for mixed plastic waste you need, you are required to send those times.

53:20

And each of the reporting entities, after transfer processor's Disposal Facilities Broker Transporters Recycler, composters, they all essentially have the same language with some differences that I'll point out only get to those sections.

53:39

Sidewalks are sending fatigue into a facility in California. We have to support these cycling origins is they're not exploiting it.

53:49

Yeah, That's a great question.

53:52

The reason is that if you send, say, mixed plastic or any or any recycling, really, that could contain mixed plastic to another facility in California, unless that facility is an end user, you don't know what's going to happen to that material. So, if you send mixed recycling to an end user, well, that's done that.

54:17

They're not a reporting entity and RS.

54:20

But if you use if you're a recycler or transfer processor and you're sending plastic materials or other recyclables to another transfer processor, well you don't know what's going to happen to those materials.

54:33

At the second facility, The second facility might pull out the mixed plastic and export them and in order for that facility to be able to report an RD or aes, they have to have the origins for that material.

54:46

So, that's why you need to pass along that information, so that whatever facility ultimately does, the exporting, has the information that it needs to report appropriately.

55:03

Well, reporting origins may only apply to exports but in order for someone who exports the material to be able to report the origins. They need to get that from the person who they got the material from.

55:18

So, if a recycler directly exported material that it received from just keep on walking up then the recycler wouldn't have any like they could do that um but if the recycler is receiving material from a transfer processor and the recycler exports mixed plastic waste because it doesn't have anything else to do with it.

55:41

Then, the recycler has to report the origins in ...

55:44

and the recycler needs to have those origins in order for the recycler to have those origins, it either has to host assign them, or collect them from the reporting entity that sent them.

55:56

And, the host assignment isn't necessarily going to be an accurate option, so, that's why we are requiring reporting entities to pass along this information.

56:07

But, you will see as we get on and the methods are not going to necessarily be requiring everyone who needs to report Jurisdiction of origin to do things like gade surveys.

56:18

You know, the methods aren't going to be, we're trying to leave options in the methods so that the jurisdiction of origen's not overly burdensome for the reporting community.

56:29

So, I'll get to that once we get to the methods.

56:34

So, now we're into the disposal facilities section.

56:39

The first kind of change here that's not really non substantives is that we're kind of clarifying how disposal facilities are supposed to report if they receive and directly transfer material.

56:58

Um, so when disposal facility is receive, indirectly transfer, without doing any kind of resume, doing any miscellaneous processing, um, whether they help, whether they report kind of depends on the material that they're handling.

57:14

So, if a solid Waste facility receives, indirectly transfers, solid waste, designated waste disaster debris, or green, or non green material harm, or potential beneficial re-use, which is, I written out here in paragraph three, then they should really be reporting as a transfer processor because they're acting as one.

57:34

If they just receive material and then send material, they're just acting as a transfer station.

57:40

So, they need to report under the requirements of a transfer processor, but if they're receiving and transferring other material, that's, you know, not solid waste, for example.

57:51

Then, they, then, they can consider that materials having been generated by the disposal facility and then the regulations in one, paragraph 1 and 2, apply.

58:03

There aren't really any or any really new changes and paragraphs 1 and 2.

58:12

So, a question, do you have an example of what's not solloway, so, example, example of that would be recycling.

58:19

So, if you receive recycling and you directly transfer that material, you should consider that material as having been generated on site by the spouse facility.

58:47

So, let's continue going.

58:49

So disposal facilities, as I mentioned, they have to report mixed plastic waste that they export.

58:55

That's the same as the other, the same requirement as we went over for trans processors and contra toddlers. Eric, I'm seeing a question from Larry Sweetsir, so in my unmute, Larry, and, and see if he can expand upon it.

59:11

Sure, Thanks, Sam.

59:25

Layer, is there anything you wanted to expand upon for your questions? So you answered it about the plastics.

59:32

But disabilities receive material for many jurisdictions so I'm not sure why the landfill or their disposal facility would have to be the jurisdiction.

59:43

A generator is generated there.

59:46

If they know what other jurisdictions, it's coming.

59:55

Well, when we when we talk about material generated, we're not saying that that material should be host assigned to the landfill. It's really about the reporting requirements and be yours.

1:00:06

Talking about material that's generated by the facility or material that's not generated.

1:00:11

Buy the facility.

1:00:13

So if, if you receive, say, recycling, Sorry, recycling are created generated, separator recovered as a result of on-site activities.

1:00:24

Then they would be considered generated by the disposal facility and you would be reporting pursuant to, um, 1 0, 1 5 zero point nine for those tons. So it's not necessarily requiring that you host assign quotes only the material they generate themselves, not material they receive and then pass on.

1:00:48

Right, But, um.

1:00:57

Yeah.

1:01:02

I don't want to say something incorrect. So, I think I'll pause on that and think about it. If you have further questions, we can answer that. I think we'll need to talk about that more.

1:01:10

But there's also a timing issue, because it's it's common that material go from one transportation to another possibly even to another facility after that The timing on when the reports are due.

1:01:23

When you get the data, there may be allies may cause the second facility to be late, because I think about it Millimeter, hm.

1:01:32

Makes sense.

1:01:35

Well, it happens.

1:01:37

How do we handle it?

1:01:39

Well, if it happens, no, the reporting requirements say that transfer processors have there, um, there are due dates, so I imagine there will be some training time where each of you learn how to provide material in a timely manner.

1:01:56

And, of course, I can't recommend that you do this, but there's also the option that, you know, if you find later that you had extra information, you can revise your reports, to add that extra information.

1:02:11

You'll be you should try to get it in by the reporting deadline, but we do allow you. The system does allow you to revise reports if needed.

1:02:19

What about the second assimilating?

1:02:21

They don't get the data Until after I reported, or, at the same time, I've already reported, Maybe early.

1:02:28

Then, I have to revise my report, because the first facility was late staff, and Few if, if you provided information into already arrests, which you discovered was inaccurate based on updates from the first transfer processor, you should definitely go back into your report and revise it to reflect the new information.

1:02:54

So before.

1:03:03

OK, so I think let's continue on, too.

1:03:07

The rest of the disposal facilities.

1:03:12

So, disposal facilities, they also, like trans processors, needs.

1:03:17

Collection method that's no different.

1:03:20

They just provide collection method, as we've described already.

1:03:24

Disposal facilities will also need to pass along.

1:03:27

information for its onset is exactly the same way as transfer processors, so I won't go into kind of the details of the information that they need to pass along there.

1:03:40

So, now we're in the recycler composter section.

1:03:45

So, recycler composters, again, we have the changes relevant to when you send times through a rubber transporter. That's the same as I've already described.

1:03:55

No. Proper transport takes control outside of California.

1:03:59

Then you just need to provide the material type by region.

1:04:02

Don't go into that anymore detail.

1:04:07

So, recycler composters, they also need to provide collection method.

1:04:12

Notice that the language here is a little bit different from what we wrote before For transit processors.

1:04:17

For example, they provide collection method or tons received for purposes other than disposal.

1:04:24

For example, but recycler composters they just provide collection method for tons received for recycling and composting.

1:04:31

And that's because recyclers and composters should not be receiving tons for disposal.

1:04:36

They should only be receiving tons by definition for recycling or composting.

1:04:42

Recycler composters, who export mixed plastic, also need to report the jurisdiction of origin, region, and material type for that next plastic, which is just the same as all of the other our reporting entities that we've discussed so far.

1:05:00

So, the last change for recycler composters is that like tepees and disposal facilities they need to provide information two destination facilities for tons sent.

1:05:12

But due to 408 to 1.5 week of the Public Resources code we cannot require recycler composters two provide jurisdiction of origin. And I see your question, Carlos. I'll answer that.

1:05:30

And, just to just a moment, um, or I'll come to that in just a moment. I don't know that I have an answer for you.

1:05:37

So, because we cannot require recycler composters to provide jurisdiction of origin for non mixed plastic waste tons, what we're doing is saying that recycler composters may elect.

1:05:53

So, it's optional to identify and provide the jurisdiction of origin to the destination.

1:05:59

If the sending facility you know, if the recycler composter does elect to do so, Then they need to follow the methods that are written out and won a 1 5 zero point nine.

1:06:13

And this only this election only applies to solid waste and material sent for recite solloway screen material and material zipper recycling, um, to the facilities listed in B But, all of that notwithstanding.

1:06:34

So, if a recycler composters Sen's mixed plastics specifically to a reporting entity, then you do need then you are required to provide the jurisdiction of origin for those tons.

1:06:47

And the reason is required for mixed plastic is because 4182 zero point five specifically gives Terracycle the authority to require origins for mix plastic, doesn't

give us the authority for other non mixed plastic waste tons, which is why it's optional for everything other than mixed plastic.

1:07:06

But, for mixed plastic, it is, it's required.

1:07:12

And there's a question in the chat, you know, What percentage of California's mixed plastics are exported?

1:07:20

Um, well, we don't really have a way, two estimate that, because, of course, not all of California's mixed plastics are going to be exported, And we can, I could try to estimate that.

1:07:38

But you'd have to send us an e-mail, because I can't do that just off the top of my head right now. I don't have that information.

1:07:45

I don't want to make something up and give, you, know, this is totally wrong number, but if you are curious, send our rulemaking e-mail a message, and we can try to delve into that for you.

1:08:00

For those curious, I also forgot that I was going to add our rulemaking e-mail to the chat.

1:08:07

Sure, I'll do just now for reference, if you want to send an e-mail, now are some point later on.

1:08:20

So continuing back to turning back to the regulations here.

1:08:26

We go on to brokers and transporters.

1:08:30

Again, brokers and transporters, it's really just the same changes as recyclers and composters.

1:08:37

They need your report collection method except brokers and transporters. they don't really accept tons or processing.

1:08:45

So brokers and transporters are going to be required to report Collection Method, four tons sent, rather than tons accepted, because they don't really have tons accepted. They just kind of take the material and send it out.

1:08:58

And then there will be required to convert, provide region, material type and jurisdiction for export in mixed plastic waste.

1:09:08

And I haven't mentioned this thus far, but I should have these these requirements for collection method and exported mix plastic.

1:09:16

The reporting for them does not start until 20 24, Q four.

1:09:20

That's one of the changes that we specified, will not start until Q four.

1:09:24

And you'll notice that we haven't written that here in each of the reporting entity sections, because that's covered in the methods the method section lists when those are required.

1:09:37

Brokers and transporters like recycler composters they have to provide information to a destination reporting entity.

1:09:44

And again, it's not required for any material other than mixed plastic waste, essentially, but for mixed plastic, it is required to provide the origins.

1:09:57

So let's talk about methods.

1:10:00

I'm not actually going to do this in order, because we've been talking about collection method and origins.

1:10:07

First I'm going to do B which deals with, um, which includes our new changes for origins, essentially one of the things in B that kind of comes throughout the methods actually is that.

1:10:27

Our method sections currently, they often say they often use the words, or using other methods.

1:10:36

So, you are able to provide information to the department using methods as specified, and the regulations are using other methods.

1:10:46

And where we have done that, we've now added language to say, these other methods have to be approved by the department per 1 and 8 1 5 zero point nine am, and to scroll quickly to 1815 zero point nine M.

1:11:04

It's really just the simple saying that other reporting entity, and this doesn't start until reporting period 1 to 20 24, you just submit a request to the department.

1:11:15

Um, I can't say whether we'll build this into already IRS or whether it will just be you send us an e-mail.

1:11:22

But, you know, if we don't build it into ...

1:11:24

immediately, then, of course, you'll just send us an e-mail, or you know, snail mail whatever your preferences, I suppose.

1:11:31

And then we'll have 60 days to review and approve the method, and you'd basically just need to justify why this is a reasonable method.

1:11:41

And, Larry, I see your question on page 32. Let's come to that when we start reviewing that section.

1:11:51

So coming back to the origins.

1:11:55

We have added a variety of new paragraphs or several new paragraphs to the origins methods.

1:12:04

And most of these changes are really geared towards allowing facilities to report more granular information for material that they would have previously host assigned.

1:12:17

So, I mentioned an example earlier where a transfer processor and Davis, for example, might receive material like residual solid waste disposal from A Recycler, composter, and humble.

1:12:32

Currently, the way that would play out in our DRS is that the devas transfer processor would host assign those materials to the location, find which the or from their own location or they would host assign them to the recycler compo where the recycler composter came from.

1:12:52

So, either Humboldt or two Davis.

1:12:57

And now what we're saying is, we're basically allowing the transfer processor two, attempt to do other methods.

1:13:05

So if they're a transfer processor, gets the origins information for those materials from the facility and humble than the transfer process or can report those, it doesn't. It doesn't have to host assign them any more just because they are residuals.

1:13:24

Conversely, if the facility cannot reasonably track jurisdiction for the generated materials, but you accept origins for the accepting materials just as a whole.

1:13:36

Like if you don't know what your residuals are, specifically, but you do know that your inflows are 50% jurisdiction, one and 50% jurisdiction too, then you would just say that your residuals are 50%, J one, and 50%, J two.

1:13:54

We're also including this last option, which is basically a typical host assignment scenario, where if you are generating facilities, generating residuals on-site.

1:14:03

So it's not really the Davis facility receiving tons from humble.

1:14:08

It's like the Devas facility is generating its own residuals, then you would just post, assign them to yourself if you can't figure it out.

1:14:22

And it looks like Larry is saying the comment.

1:14:26

That allocating residuals has been standard practice.

1:14:29

That's great, it's great that you guys have been been doing that, but the regulations didn't really specifically clarify that, That that was allowed.

1:14:37

So we're now we're trying to include those scenarios into the regulations.

1:14:42

So that, like on the ground practice is really reflected in the regulations themselves.

1:14:50

Recyclers composters, Brokers and transporters, previously were required to just host assign tons to themselves.

1:15:00

And now Paragraph 2.5 it's saying that they're allowed to use other methods effectively, we have some options here where they can request information from the person bringing the materials.

1:15:12

They could use periodic reports like if they're receiving material from a contract taller or they could use other methods approved by the department.

1:15:20

And finally, if they can't do any of that, if all of that is not really possible for their facility meeting, no, I know that there are recyclers who just let people come up and drop off material. And there's no gate attendant.

1:15:32

Then you could really just host assign, as per normal, or not necessarily normal, but you could host assign to your own facility.

1:15:42

So that's what 2.5 is about is really, um, residual or jurisdiction for materials received by Recyclers composters and Broker transporters.

1:15:52

2.4 is Jurisdiction four: materials that are accepted and generated.

1:16:00

2.6 is about what you do if you are supposed to receive origins, um, but the facility does not give you those origins.

1:16:18

Then it just A, B, C, and D, specify what you are supposed to do.

1:16:24

For example, if if the recipient reporting entity is a broker transporter, like if you are a broker transporter and you're reporting then you would just report the jurisdiction of origin as where you took control of material.

1:16:39

Alternatively, if you are not a broker transporter.

1:16:42

And at the sending facility is a transfer processor for example then you would determine the jurisdiction of origin.

1:16:48

Um where the sending facility is is located.

1:16:53

And likewise C I won't go through CND but basically this is just saying how you are supposed to derive jurisdiction of origin if you were supposed to have received it from the sending facility and they didn't give it to you.

1:17:09

3.5 is about how transfer processors are supposed to determine the jurisdiction of origin for materials sent.

1:17:20

So when a transfer processor is giving the jurisdiction of origin to the destination, they need to figure that out based on allocations from any inbound materials.

1:17:34

So, if you've got 50, 50% from two jurisdictions on your inbound, then, based on who you're sending a facility to, you would report, you know, 50 50, or maybe it's 75, 25, if you are sending jurisdictions to different facilities based on the def and based on the destination, silly.

1:17:54

And that's basically the same as what transfer processors are already doing when they report an RD or S It's just that they're not reporting that in ... anymore.

1:18:04

Are They're not reporting for this material in our interests. They're getting it to the destination.

1:18:10

Paragraph four, you've note you'll notice that we basically struck out the entire original paragraph and added a new new language here.

1:18:22

So Paragraph four was originally the paragraph that specified that recyclers, composters and others needed to host assigned material.

1:18:31

And now what we're saying is that Recyclers Composters and others four tons sent they figure out jurisdiction of origin based on A, B and C And it's the same logic is what we determined earlier where if you absolutely cannot determine what the origins are, then you will follow C.

1:18:49

So you'll host assign if you, for whatever reason, can specifically track the origins, like you know what the origins are on both your inflow and your Airflow side. Then you can report those origins specifically.

1:19:03

But if you don't know the origins of your outflow and you do know the origins of your inflow, then you would report the Origins Proportionally.

1:19:11

Like, if your inflow is 640, then your outflows would be 6040 As well.

1:19:21

And paragraph five it kind of our last origins change last but not least, is that commencing reporting period for 2024 you are going to determine the jurisdiction of origin for exporting mixed waste based on allocations of inbound materials.

1:19:38

So as the exporting entity, The person who's sending you, the materials should give you the origins and you should know, like?

1:19:44

OK, I got 60% of my inflow from Entity X, and it was all from jurisdiction.

1:19:50

one and I got 40% of my inflow from Entity Y, and it was all from jurisdiction to.

1:19:56

So, my alpha will be 60% jurisdiction, one and 40% jurisdiction to basically, you just need to figure that out and then, report the origins, and RD RS.

1:20:12

So, that's kind of the origin section.

1:20:13

Let's jump back to the material types since I think, Carlos, or maybe sorry, someone else, was asking, about the material types earlier, Uh, to section a subdivision A We've made a variety of changes that are mostly just organizational.

1:20:32

Some are just organizational and clarifying.

1:20:36

For example, zero point four and zero point five these sections pre mostly previously existed in the regulations but we're just re-organizing it.

1:20:45

So it's clear.

1:20:46

So if you send material to a disposal facility for disposal, then that's solid waste like it doesn't matter if it's actually plastic bottles.

1:20:55

Number one, you don't get to call it recycling.

1:20:59

If it's sent to a disposal facility for disposal, then it's solid waste and you need to report it as solid waste, in which case, jurisdiction of Origin reporting requirements.

1:21:08

Um, what apply?

1:21:13

The the other main changes and kind of the material type section, which is Subdivision A Are that we have clarified how entities' basically report material type. So, Material Type.

1:21:36

Reporting varies based on reporting, entity and Material stream.

1:21:41

So, whether you need to provide a specific material type depends on whether you're reporting, say solid waste, which is the material stream, or whether you are like a recycler composter.

1:21:53

So for example, um recycler composters who reports solid waste they need to report the material type.

1:22:02

And that's what Subdivision B are.

1:22:07

Paragraph Sub Paragraph B here says recyclers and composters need to report the material type.

1:22:12

Including residuals, coding for residuals versus contract toddler's and and transit processors, for example.

1:22:22

They only, they don't provide Material type four.

1:22:25

Those materials they all materials in a Solid Waste Exiting, Waste and Disaster ...

1:22:30

are just, are just those streams.

1:22:32

There's no mature ferrotype, everything else, other materials reported according to paragraph two, and beneficiary uses recorded reporting that paragraph three.

1:22:42

There are no changes in Paragraph three.

1:22:45

The main change in Paragraph two is that we've added some examples to clarify.

That material type includes form, say bottles, cans.

1:22:57

and that, starting in 20, 24, Q four, If you report A, I'm a non homogenous flow material.

1:23:07

So if you say report, mixed plastic waste and already RS, you'll need to tell us what are the individual components of that mix.

1:23:17

Part of that outflow.

1:23:19

You won't need to do it by tons.

1:23:21

But if your Airflow is a mixture it mixed plastic, and it includes HDPE, bottles, P two bottles, and non rigid, for example, you'll have to report those, and already RS.

1:23:32

And you might be wondering why we're doing that? We're doing that for several reasons.

1:23:36

one of which is that?

1:23:39

SB 343 requires us to collect material type and form information for materials that are sent to recovery and recycling. So that's why we need kind of this more granular information if people, if everybody reports mixed plastic.

1:23:57

No, we don't have enough information to meet our requirements for SB 343.

1:24:02

Similarly, SB 1035 requires more detailed information about specific materials that are recycled. And so, we're hoping that this reporting and ... can also assist with SB 335.

1:24:20

So that's material type.

1:24:22

I see your question, Larry, So let's let's jump to next section, which is subdivision.

1:24:30

C: What is your comment on small vehicles? That's the first thing here. So why don't we just jump to that?

1:24:42

Yeah, so I think I understand what you're trying to do by separating out small vehicles into cell, phone, commercial residential.

1:24:51

But the requirement that they have a commercial emblem or like commercial license plate is not universal.

1:25:01

There are many commercial entities that don't have those and although we are recognized as commercial and their cell phone in smaller vehicles.

1:25:12

Yes.

1:25:14

We realize that and it's not, it's not going to be a perfect solution and, you know, not all small vehicles are going to be.

1:25:27

Residential cell fall. They might be commercial self hall even if they don't have an emblem on them.

1:25:33

But short of having chert requiring a reporting entity to ask every single vehicle coming in, where are you residential or self or commercial?

1:25:43

There's not really a great, um, way to do that.

1:25:48

So what we're trying to do in the regulations is balance getting more detailed information versus creating undue reporting burden for the reporting entities.

1:25:58

So we don't necessarily want to require you to ask every single person who comes in because that's not really feasible for a lot of facilities.

1:26:07

On the other hand, we do want to get at least some information, and, generally, small vehicles are probably not going to be commercial.

1:26:16

So, it it.

1:26:17

You know, we do what we can, right?

1:26:19

And if you have other suggestions about, what, what's the best way to piece those out and not in a way that's not overly burdensome, please send them to the inbox, and we can try to work through those.

1:26:32

Well, let me further follow up that goes representing rural counties. We like, simple, so simple. It's hard to do.

1:26:38

I understand that, and I appreciate that, but we may also be able to prefer to do that just because we may need to track those commercial entities for mandatory commercial sites for 41 purposes.

1:26:53

So this would take away that tool to use because So I think this one needs a bit more thought and I appreciate having a default simple option but there should be an allowance for some other method for doing that and just arbitrarily based on a license plate or an emblem.

1:27:11

Yeah. So, 1 1 important thing to keep in mind is that paragraph one is just one of the methods.

1:27:17

you can use any of the methods and in Subdivision C and for example, A paragraph four says that you can ask the driver of each incoming load.

1:27:32

So we still do have that option if you want to ask each individual driver you're not required to classify a small vehicle as residential cell phone, for example.

1:27:47

It's not clear that that wasn't options Or look at it again.

1:27:54

Let me mute you and then I'll answer the other question.

1:27:57

Yeah.

1:27:59

So, we have another question.

1:28:01

So if you have a mixed recycling container that the public puts puts mixed recycling into a landfill, do I need to climb into the roll off to figure it out?

1:28:14

Um, So, Valerie, can you clarify what you mean, or are you, you're talking about figuring out the jurisdiction of origin or figuring out the material type?

1:28:26

Or what?

1:28:33

And if you prefer to speak your comment, I can unmute you.

1:28:41

OK, for material type, so he had an mixed recycling that the public puts mixed recycling into a landfill.

1:28:49

Um, so if you really have no idea what the material types are that are going into your airflow and, again, for for recycling, already IRS does not require reporting of inflows. No, this is really just reporting of outflows.

1:29:13

So the reason we're framing the regulations in the material type in this way, let me jump back to that section.

1:29:22

The reason we're requiring people to provide the specific materials and a general mixture.

1:29:33

Is that we are operating under the assumption that when you sell or transfer material to a destination facility, that destination facility, it's not really often going

to just want mixed materials. They want they might want to know what's in it generally.

1:29:53

And so if you have to tell that to the destination, then you can tell it to already or S.

1:29:58

On the other hand, if you really are sending material to a facility and that you have no idea what that recycling is other than its recycling, Um, then, I think we'd have to chat about that amongst, you know, an RN.

1:30:16

But I think what we would have you do is just, just report it as mixed recycling still, because you really have no idea what it is, we would not want you to have to go through.

1:30:26

And potentially do the dangerous thing of you know, sorting, jumping into a roll off, and literally sorting what's in there. Of course, it might be pretty burdensome for, for you to hire people to sort that.

1:30:38

So I don't think that's what we'd want.

1:30:41

Can you try it out?

1:30:42

Yeah, it's not I intend to have people sort material be beyond the level that they're sorting for their own operations. The intent of that, you know, determining the component material types of mixed outflows is that if you're sending a bailed out flow so I mean that involves processing, right sorting and baling of material. It may be a mixed plastic, but by your specifications of your operations, you would know what plastics you're sorting out of your line. And putting into those bales just by design, that's what we're really looking at, is by design with what are going into those bales, not, if you're not doing any processing. So in this case it's a roll off container.

1:31:23

It's not being processed at that landfill, um.

1:31:29

No, it's just going, you know, that roll off, as being taken somewhere else, where the for processing does occur. That facility, when they send that material out, after the process, to, know they have some sort of specification, that's when we would be looking for those component materials.

1:31:47

For you, we'd make sure that there's an option there, know, rather than selecting what the material components are. You could select that you do not process or sort these Materials.

1:32:04

Excellent, Thanks for that, Dan.

1:32:09

Yeah, I see that, Larry. You add an additional comment about how roll offs are sometimes.

1:32:15

No transferred by a commercial operator, but they are actually include or contain residential waste.

1:32:21

That is something that we thought of, as well.

1:32:24

You know, if, if someone's house is being demolished, it's sort of residential in that the materials generated by the residential home.

1:32:35

But the resident is not doing the demolishing. You know, they're paying a commercial company to do the demolishing.

1:32:40

So, it's not necessarily always clear whether things are going to be commercial or residential.

1:32:47

So, yeah, we're really, it's really hard, I think, to get a good balance between simplicity and, and accuracy, but we're totally willing to, here are more thoughts on that.

1:32:58

I think it'd be better if you'd like, send us an e-mail rather than kind of going into the nitty gritty of that right now.

1:33:06

Yeah, we definitely appreciate that, Larry, We've had these discussions quite a bit, You know, if if there's debris from having your roof done, is that commercial or residential, you know, so these are all very, very good questions, and we just have to draw the line somewhere, and, and it can legitimately be, argued in multiple ways. So, we just do the best we can at, drawing that line, where we think it's, it's reasonable, and then that's how we consider Source Sector.

1:33:40

Speaking of source sector, one of the things that you'll notice here is that paragraph five talks about assigning disaster debris and designated waste.

1:33:49

And these are going to be just always self hauled.

1:33:52

Um, and that's because there's not really a great logical reason to consider disaster re, for example, residential or commercial during a disaster of cleanup.

1:34:02

They're not really going to be, you know, looking at that breakdown a lot.

1:34:07

So for the purposes of already arrest, these materials are always going to be self hall, and they're not currently reported, and ... only talks about source sector of solid waste, and that's not going to change.

1:34:19

Um.

1:34:20

So, source sector is really just applied to solid waste, an RD or S And I mentioned this earlier.

1:34:30

For material that you receive, say from a recycler like if you get residual solid waste recycler and you're disposing that at your landfill, you would just say that you got that from a recycler.

1:34:42

We're not going to be asking you to figure out is that residential or commercial, um, solid waste is just a final recycler at that point.

1:34:57

So, let's keep going through the methods.

1:35:02

Let's find the, one of the big changes here, and the rest of the methods, is that we had N J 1 8 1 5.9 J. We talk about the material streams that are ERS has four Outflows.

1:35:22

And we're adding a new section here for mixed or new paragraph, I should say, for mixed plastic waste.

1:35:32

So what that means is that if you export mixed plastic waste, that's going to be reported separately in a new material stream in RD RS.

1:35:43

And we're doing that as opposed to just looking at, say, tons that are exported and the recycling composting versus endues streams and so on.

1:35:54

We're not doing that, because we figured that would just be too complicated to, be easier. Just to say, you've got a mixed plastic waste export, that's going to go on its own stream.

1:36:05

So, you're going to report that separately, so there will be adding a new material stream.

1:36:10

two RD RS.

1:36:14

And Kay, here, J is about how you Report materials stream for outflows K, which is a new subdivision analogous Lee talks about material stream but for inflows and we've received questions ever.

1:36:35

So, so every so often about how people should be reporting in flows that they, that they process and do things with.

1:36:42

So, we wanted to clarify what should happen.

1:36:45

Um, in those various cases, that's what Kay does.

1:36:51

Paragraph one just lists all of the inflow streams and what's required for the inflows, so that's not anything new.

1:36:58

And that's really covered elsewhere in the regulations, but paragraph one is just a nice summary There paragraph two says that you accept material for recycling and composting.

1:37:10

You don't report that as an inflow and that's not new, but we are emphasizing that if your recycling is contaminated with solid waste, such that it can't be handled by a recycling center, which is basically the three part role.

1:37:24

Like if your inbound recycling composting is, for example, more than 10% contaminated with solid waste, You need to consider that material As solid waste. You know, just because you accept it as recycling doesn't necessarily mean it qualifies as recycling.

1:37:41

Um, that's what paragraph two is about.

1:37:46

Paragraph three is, is what I mentioned earlier about how you are supposed to report.

1:37:52

Um.

1:37:56

Materials that based on Processing 3 and 4 are really that way.

1:37:59

So if you accept materials and you don't process them, then you just classify them into the tons sent.

1:38:05

Like if you have material, then, and you few accept material and you send it out for beneficiary re-use, then you should report it as accepted as beneficial re-use.

1:38:17

Conversely, if you do some processing, you have to kinda think about what's going on.

1:38:23

Um, first of all, if you generate solid waste from your processing, then you'll need to report as inflow the residual solid waste that you generated.

1:38:35

And the reason that is, is because we require origins for solid waste and green material, for beneficial re-use, for example.

1:38:44

And if you don't report that inflow, then there's no origins for those tons.

1:38:49

So that's why we need to have those inflows report it out separately.

1:38:56

Um, on the other hand, if your processing generates solid waste, but that solid waste to say more, more than 10% of the et cetera material, then all of the accepted material, as we said earlier, really needs to be, I report it as as solid waste.

1:39:17

Excuse me, I said something wrong there earlier I was saying if residual solid waste is generated from times excepted as solid waste like so if you accept solid waste and you do some processing on that solid waste to recover things, then the residual times should be reported as part of the original accepted tonnage.

1:39:40

But if you, except material not for solid waste, like if you're not, if it's accepted for recycling and it's a 5% sideways, then you would pull out the 5%.

1:39:53

That was solid waste and report that separately as an inflow, that's what's covered in D And for materials that you kind of generate or process into multiple streams, we're sort of asking you to do that by kind of how it's how it's processed.

1:40:11

So if a reporting entity accepts a mixed materials stream, and looking at paragraph C now, and if it's ultimately sent out as 75%, one stream, and 25% another stream, then you would classify on the inbound side as that majority stream as the 75% stream. And this example, it's non green. But no, that applies to anything.

1:40:37

And if it were 75% recycling, then that would mean, you know, you wouldn't report that recycling inbound because you don't report recycling in RD RS.

1:40:55

Only have about 20 minutes left, so let's I'm going to continue on. I realized that's kind of confusing.

1:40:59

But continue on to Collection method.

1:41:04

So that's what Subdivision L is. Subdivision L specifies how people are supposed to acquire and then provide collection method.

1:41:14

Contract toddlers', basically they just report it to the department.

1:41:19

Contract haulers also need to provide the collection method to the reporting entity if they are giving to a reporting entity in State.

1:41:27

Contract toddler's can use any of this but any of the listed mess it's very similar to jurisdiction of origin, contract agreements, billing records and so on.

1:41:38

A reporting entity, other than a haller base, needs to report collection method as specified in paragraph four, which is basically just if you get it from a contract taller than you were report what the contract toddler tells you.

1:41:54

If you don't get it from a contract taller than it's either going to be so-called residential or so-called commercial.

1:42:00

Because presumably it's it's coming from a generator if it's coming from a generator, and then you're just going to determine, you know, is it is it recycling.

1:42:11

Was it mixed recycling bins on your site and so on.

1:42:17

If you are generating materials through an on-site recycler composter, like if you're a transfer processor and, it's the on-site recycler that's generating materials.

1:42:28

Then you just need to follow the rules as specified and A, B and C for the Recycler composter, um, and if you are generating through other on-site activities, then then you would report as that on-site activity.

1:42:47

So, if you had other on-site activities besides recycler composter, then you would report as that as your reporting entity.

1:42:56

So, if you had if you're a landfill and you had miscellaneous recycling going on, you don't really have an official recycler than you might report the collection type as the landfill, say as the generating facility.

1:43:10

And we already talked about just, if you have alternative methods, that you want us to consider, Send us a message.

1:43:16

We'll have 60 days to review, and we'll get back to you.

1:43:21

When anyone 5.1.

1:43:23

No changes, So I'm just going to skip, skip right through that, 1, 8 1, 5.11.

1:43:30

The only change here is that we are requiring additional record retention.

1:43:36

So 111, 5.11 is about record retention.

1:43:40

And B one is specifically about record keeping records or origins.

1:43:45

Originally B one specify that you need to keep the kind of origins records for solid waste.

1:43:53

But obviously you report origins for more than just solid waste for also green material and export an origins. So, paragraph one is expanded now to refer to any material for which jurisdiction of origin is required.

1:44:10

So that would be solid waste, green material, and mixed plastic waste, really effective way.

1:44:16

12, no changes made to that section.

1:44:19

So again, just skipping through that, zero point thirteen: No changes made.

1:44:25

And the last section, the regulatory changes is not actually in our already IRS regulations, but it's in a different article, article nine rather than 9.25.

1:44:36

And it's in a different section, 1 8 7 9 4.2.

1:44:41

The reason we are updating this section because this is talking about reporting requirements for calculations in the ear or the electronic annual report, so how, how tons and how disposal.

1:44:54

What numbers kind of go into the disposal calculation.

1:44:58

The main change here that's substantives, is that we've added a paragraph seven to specify that mixed plastic waste, that's consider disposal according to 478 1.4.

1:45:12

We'll be consider disposal for the purposes of this section, and the reason we have to do that, of course, is because 1, 2, 3, 4, 5, and six, specify all the different ways that all the different things that go into disposal and AB 81 added a new disposal type. Export it, mixed plastic.

1:45:33

So we had to add that into, see, but this doesn't affect anything and ..., This is really just a disposal calculation, which already IRS numbers are used for.

1:45:50

And that's the last change.

1:45:51

I realized that was a very fast overview of all of our changes.

1:45:56

I apologize that, you know, we couldn't go into detail on everything. But we have about 15 more minutes.

1:46:02

So, if there are specific questions, We're happy to, I'll go through those in more detail now.

1:46:20

If there are no questions, you're free to.

1:46:23

No, we'll just pria myself, and Dan will hang out on the line until 12, so you can feel free to think about it for the next several minutes, and just let us know when you have question.

1:46:59

When are we accepted? We have a question, where do we accepting comments?

1:47:02

So this is just an informal workshop.

1:47:05

We're not, this is not a formal hearing where we have 45 days, so there's no sort of comment period if, if you want us to read it, just think about your comments, probably the sooner, the better.

1:47:20

Um, we're trying to get the formal rulemaking started around November.

1:47:27

But we have, you know, go through several internal stages before the regulations get approved.

1:47:33

So we really need to, um, kind of get the final draft sorted probably in the next several weeks.

1:47:39

So if you want to get us comments before, then that would, that would be ideal.

1:47:46

What is the best contact for comments? You know, just send them.

1:47:49

Any comments to the rulemaking e-mail, which is in the chat: You don't need to address it to anyone, you know.

1:47:57

We're just a rulemaking team. If you want to send it to somebody, you can say, Dear Eric, that's fine. But it's just a rulemaking team.

1:49:53

OK, we have another question in the Chat.

1:50:03

So, if a jurisdiction collected mixed plastic, but sorts it into the component types, as long as the jurisdiction has a market for each type of plastic, well the jurisdiction to be able to consider them mature recyclable and count towards their diversion rate.

1:50:21

So that's a great question that depends on what the facility, who it is doing with it.

1:50:27

So if the facility sorts the mixed plastic into each individual resin, like if they saw it 1, 2, 3, 5 and 7 into separate bays 1, 2, 3, 5 and 7, then it's not mixed plastic.

1:50:40

Because mixed plastic, well, 5 and seven would be considered mixed plastics, still.

1:50:47

Not not five, excuse me, 3 and 7 would be considered mixed plastic by our definition, even if they're not separated. That's an important distinction.

1:50:57

So the statute, The way it's worded aye.

1:51:02

Is worded to imply that mixtures of plastics: 3, 4, 6, and seven, um, are mixed plastic, even if they're not mixture, like, plastic number three, it's considered mixed plastic, even if it's not mixed with anything else.

1:51:21

And that's the way our regulations are currently written.

1:51:24

You're welcome to make a comment on that, You can check that out.

1:51:27

And 18815 zero point two, 10.5 is collection method.

1:51:34

The definition for mixed plastic is 38.4. You can look at that. And think about that since comment, if you want.

1:51:43

So if it's like, only number three, that would still be considered mixed, mixed plastic, and therefore would be considered disposal for the purposes of AB 881.

1:51:55

But if you pulled out 1, 2, and five, even if 1, 2, and five were mixed together, as long as it was only 1, 2, and five, that would not be considered disposal.

1:52:11

Does that answer your question, OK, the next question is, Do you anticipate further training for upcoming changes?

1:52:20

So, what we will do is, we'll, of course, once we start the rulemaking will have a formal hearing, too, Except comments after the 45 days are not currently planning on having any more informal workshops, But that may change.

1:52:39

If people are no requests that are we decide internally, that we really need to do that.

1:52:45

Um, in addition to the, you know, the rulemaking, we're also, of course, going to have trainings on the changes to ..., you know, the regulations are going to require changes to your S So we'll have trainings on that. You know, we're not just going to implement the changes and say how fun.

1:53:02

We'll have workshops and training videos to say, these are what the changes are.

1:53:07

This is what?

1:53:09

This is how you fill out the new, the new requirements. I also mentioned, we'll likely have workshops on developing the new, kind of, collection method options, as well as changes to the material type list.

1:53:27

So, Or, was that you, Dan, I'm going to chime in?

1:53:31

Yeah. No, I was, I was gonna mention the training materials that we developed for RDA slash us, but you captured that, and then I just saw a question come in from voice and about the disposal. And no, no, remember that it would only be considered disposal if it's exported to another country and in actuality those other countries also at this time do not include Mexico or Canada and that's defined by the statute.

1:54:00

So we're only talking about when these, you know, these plastics are exported overseas and in such a way that we do not have any verification that that material is recycled as opposed to disposed or incinerated and things like that. And so that's straight from AB 881.

1:54:24

And so we're not, you know, we don't have any latitude to change how that may play out, but that's, that's what it is. It's specifically for overseas export.

1:54:37

Thanks for that clarification, That's great.

1:54:42

OK, there's another question from Jim Jay, would it be possible to dress specifically include the wastewater treatment plant biosolids sent to composting facility?

1:55:00

So, biosolids that are sent to a composting facility. You know that's going to be an outflow of recycling composting.

1:55:07

I'm not sure what your question is regarding that. I mean, you're talking about our new changes for AB 881 and SB 343.

1:55:16

AB 881 doesn't apply, because that's mixed plastic waste and biosolids or not mixed plastic waste.

1:55:24

If you're talking about collection method, a wastewater treatment plant is going to be considered a recycler composter and the regulations.

1:55:35

So, they are going to be require to provide collection method for inbound materials, not four, um, outbound.

1:55:47

So, I write down.

1:55:50

Yeah, I'm not sure that we're gonna see that many changes to wastewater treatment facility reporting. So, in this case, they're currently required to report on biosolids sent to a composting facility as a recycler composter outflow. That would remain the same. Yeah.

1:56:10

I'm not sure they may have to do a collection method but in this case you know, we will have collection method options that are applicable to wastewater treatment plants.

1:56:21

So, in that case, no. I think it would be a relatively minor addition to current reporting requirements.

1:56:31

Excellent. Thank you, Dan.

1:56:32

Larry, I see your question.

1:56:34

I'm going to jump to the next one just too briefly, cover that and I'll come back to yours.

1:56:39

The next question is: how and when will the recyclable material type list be?

1:56:44

Publisher discussed? Well, the r.i.r.s.

1:56:50

material types listers is already published.

1:56:53

So if you go to your favorite search engine and type in RD R S material types list, you can see the recycling and disposal reporting material type list is just a document. Click on that, it'll download.

1:57:07

And these are all of the Material type options that we have in

1:57:11

So you can see that already in terms of when are we talking about the changes to them?

1:57:19

This may change, but my current understanding of our plan is that we're going to work on updating this once we get the regulations finalized.

1:57:27

Because, you know, the regulations will will change as we go through the rulemaking process.

1:57:34

So, it doesn't necessarily make sense for us to really start editing this now.

1:57:39

Once we have a finalized version of the regulations, or at least at a point where we think we're not going to make major changes, then then we can start thinking about how we're going to edit this Material Type List to better capture what what SB 343 requires.

1:57:58

And I can post this link in the chat, as well.

1:58:08

Coming back to Larry's question, you go to the rulemaking page again, Page seven, number 43 indicates that recycling OK, so, here we are on the definitions.

1:58:22

So, Larry is asking about 43 in that our definition of recycling now includes this new option are this new text.

1:58:33

Saying that a recycler composters the has the same meaning as defined in 408, accepts that recycling Shall also include all activities.

1:58:42

Considered recycling based on 4 1, 8 2, and zero point five.

1:58:45

So, the reason we added this change is that SB 54, recently edited 401 8 to 1.5 and we will take effect January 1, 2023.

1:58:58

To specify that um, facilities that handle recyclable material are considered recyclers even if that material was not previously discarded.

1:59:16

And so, all of this all 43 is doing is saying that our definition of recycler also includes the facilities that SP 54 modified 482 and zero point five to include.

1:59:32

And if there's anything else we should say on that, I'll defer to Dan.

1:59:40

Yeah, this is really simply a change that allows the regulations to be in agreement or adapt to any statutory changes that may occur, so it's really letting the statute speak for itself.

2:00:00

Excellent, thanks for that, Dan.

2:00:02

The last few questions here, before we have to checkout would be, just, to clarify, Is, all mix plastic waste counted as solid waste, or just mixed plastics 3, 4, and seven?

2:00:13

So, it's really just plastics 3, 4, and seven, or it could be plastics 1 and 2 if those plastics are mixed with 3, 4 or 7.

2:00:26

Secondly, it's not really counted as solid waste. It's kinda disposal when you report in our DRS.

2:00:33

We're not going to ask you to report mixed plastic waste.

2:00:36

In the Solid Waste Stream, it's going to be its own.

2:00:40

It's own news stream.

2:00:43

It's really just that these mixed plastics will be considered disposal for the purposes of the Electronic annual Report or that year, and only when they are exported, right? And only when they are export it again.

2:01:05

And we have a last question: can you give an example of how a wastewater tramped this wastewater treatment plant facility word report origins?

2:01:15

So that's, I mean that's the same as it is currently if a wastewater treatment plant facility sens, an outflow of like residual solid waste to a disposal facility, they're not going to report that and already arrests.

2:01:33

They don't report that now, and we're not going to ask them to report it, but what we would be asking them to do and not requiring because this is, they're considered a recycler, Not not a disposal facility or transfer processor, is they would give the jurisdiction to the landfill.

2:01:51

And that jurisdiction is defined in our regulations, where jurisdiction is either, um, a city or like an unincorporated county or a regional agency.

2:02:23

I'm getting an error on my end, now that screen sharing is paused, it doesn't seem that I can undo that, but we're over time by a few minutes. So I think we'll stop for today. If you have any questions.

2:02:33

Please send them to the rulemaking inbox, which, again, I've posted in the chat, but I'll just read it out, Which is SB 343, underscore AB 881 underscore rulemaking at ... dot CA dot gov.

2:02:51

And I'd like to thank you all for coming.

2:02:54

It's really great to have such an interactive audience and helping us to make the regulations as good as we can to not, and to have sort of interactive feedback with, with the stakeholders. So that's really great, and thank you all for participating.

2:03:10

Yeah, We'll let you know any other updates as they come out?

2:03:15

And Thank you once again. And have a great day, everyone.