

BEFORE THE ENVIRONMENTAL PROTECTION AGENCY
STATE OF CALIFORNIA
DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY

IN THE MATTER OF:)
)
SB1013 Dealer Registration and)
Dealer Cooperatives Permanent)
Regulations Public Hearing.)
_____)

CERTIFIED COPY

TRANSCRIPT OF PROCEEDINGS
TUESDAY, APRIL 30, 2024

Reported by:
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TRANSCRIPT OF PROCEEDINGS, taken virtually and in
person, commencing at 9:01 a.m. on Tuesday, April 30, 2024
at CalEPA Headquarters Building, Byron Sher Auditorium,
1001 I Street, Sacramento, California, reported by JAMES
F. PETERS, CSR No. 10063, a Certified Shorthand Reporter
in and for the State of California

1 APPEARANCES

2
3 STAFF:

4 Kris Chisholm

5 Csilla Richmond

6
7 PUBLIC SPEAKERS

8 Alina Bekkerman, San Francisco Environment Department

9 Susan Collins, Container Recycling Institute

10 Leonard Lang

11 Greg Lanz, Recycletek

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1 SACRAMENTO, CALIFORNIA and via ZOOM VIDEOCONFERENCING

2 TUESDAY, OCTOBER 31, 2023

3
4 CSILLA RICHMOND: Good morning, everyone and
5 thank you for joining us for today's public hearing on the
6 SB 1013 Dealer Registration and Dealer Cooperatives
7 regulations. Before we begin, there are a couple of
8 announcements that need to be made.

9 First, this hearing will be recorded. There is
10 also a court reporter in attendance to transcribe the
11 proceedings of this hearing. Second, please note that
12 there is an optional sign-in sheet located in the back of
13 the room by the door. If you'd like to say informed of
14 the SB 1013 rulemaking process, please add in your name
15 and email, so you can be added to the proposed regulations
16 listserv.

17 CalRecycle has Spanish interpretation of this
18 hearing for those of you participating in person or
19 remotely. If you're in the Zoom, we have Spanish
20 interpretation -- oh, sorry. If you're in the room, we
21 have Spanish interpretation headsets available. If you're
22 participating on Zoom, just click on the interpretation
23 icon at the bottom of your Zoom window and select the
24 appropriate language.

25 Next, we have a required evacuation announcement.

1 Please look around now and identify two exits closest to
2 you. In some cases, an exit may be behind you. In the
3 event of a fire alarm, we are required to evacuate this
4 room immediately. Please take your valuables with you and
5 do not use the elevators. While staff will endeavor to
6 assist you to the nearest exit, you should also know that
7 you may find an exit door by following the ceiling-mounted
8 exit signs. Evacuees will exit down the stairways and
9 possibly to a relocation site across the street. If you
10 cannot use stairs, you'll be directed to a protective
11 vestibule inside the stairwell. Should we have to
12 relocate out of the building, please obey all traffic
13 signals and exercise caution crossing the street.

14 I will now hand it over to Chris.

15 KRIS CHISHOLM: Good morning. The purpose of
16 today's hearing is to receive public comments on the
17 proposed regulations that were published by the Office of
18 Administrative law and noticed to the public on March
19 15th, 2024. The publishing of that notice started a
20 45-day comment -- public comment period and CalRecycle
21 welcomes and will respond to all comments received at
22 today's hearing and during the 45-day public comment
23 period and the Final Statement of Reasons.

24 On today's agenda, we will have a brief overview
25 of the steps taken thus far and the current status of the

1 rulemaking followed by an opportunity to submit your
2 comments on the proposed regulation. To introduce myself,
3 my name is Chris Chisholm. I'm an attorney in the Regs
4 Unit. I'm sitting up here with Jeanette Barnard, part of
5 our Legal Office; Kristine Beckley, ACC with the Legal
6 Office; Renee Cheperka, and Karen Kayfetz both with DCE.

7 All right.

8 (Thereupon a slide presentation).

9 KRIS CHISHOLM: All right. As a brief overview
10 of the steps taken thus far for this rulemaking, the slide
11 shows that public workshops were held on April 25th,
12 August 10th, and August 31st, 2023 to solicit feedback on
13 proposed regulatory concepts and language. Following
14 those workshops, the concepts and regulatory language were
15 developed into formal rulemaking documents that were
16 published and noticed to the public on March 15th, 2024
17 starting the 45-day public comment period.

18 Today is the date of the public hearing, and
19 CalRecycle welcomes your comments on the proposed
20 regulations. Following today's hearing, CalRecycle will
21 consider all comments received and respond to those
22 comments as part of the Final Statement of Reasons.

23 [SLIDE CHANGE]

24 KRIS CHISHOLM: All right. This Final Statement
25 of Reasons will be submitted to the Office of

1 Administrative Law as part of the final official
2 rulemaking file for these proposed regulations. And then
3 the Office of Administrative Law will review the
4 rulemaking file. One the Office of Administrative Law
5 approves the regulations, they will become effective.

6 [SLIDE CHANGE]

7 CSILLA RICHMOND: CalRecycle welcomes comments
8 from the public on the proposed SB 1013 regulations. As a
9 reminder, the 45-day comment period ends at the conclusion
10 of today's public hearing.

11 Now, we would like to invite your comments on the
12 proposed regulatory changes. To ensure that CalRecycle
13 can receive everyone's comments during today's hearing,
14 please follow these rules in making oral comments. Please
15 begin by giving your name and affiliation, if any. If
16 there are several speakers with the same comment, please
17 appoint a spokesperson.

18 [SLIDE CHANGE]

19 CSILLA RICHMOND: To make a comment in person,
20 please line up at the podium. To make an oral comment via
21 Zoom, please raise your hand and the host will unmute you.
22 Please submit written comments to CalRecycle public
23 comment portal by the end of today's hearing. Comments
24 will be taken first in person and second via Zoom audio.

25 KRIS CHISHOLM: And for our audience in the room,

1 if you plan on submitting comments this is going to the
2 podium and mic that you'll be using. Thank you.

3 If you have public comments, please feel free to
4 line up at the podium or raise your hand on Zoom.

5 This public hearing is scheduled to close upon
6 the submission of the last public comment. We will be
7 closing this meeting 30 minutes after no comment is being
8 received, either on Zoom or in the room.

9 Thank you.

10 CSILLA RICHMON: It looks like we have a hand in
11 the Zoom Room, so I'm going to go ahead and unmute,
12 Leonard.

13 LEONARD LANG: This is Leonard Lang. Can you
14 hear me?

15 CSILLA RICHMOND: Yes, we can hear you.

16 LEONARD LANG: Thank you. I'd like to thank the
17 Department for this opportunity and appreciate the
18 opportunity to make these comments. First of all, I'd
19 like to say that many of the draft regulations -- the
20 proposed regulations pertaining to the dealer co-ops are
21 going beyond what's currently required by recycling
22 centers. So in my comments, which will be submitted later
23 today, I go over that. You exceed your authority in a
24 number of cases, where all you needed to do is, as far as
25 operation standards, copy or refer to the section 2500 or

1 Recycler Operation Standards. We're talking about
2 receiving material from consumers. The same with record
3 keeping, the same with some of the other ones.

4 So you've gone beyond what the law called for and
5 you're making it a lot more confusing and burdensome for
6 the dealer co-ops. I would recommend that all that be
7 dropped and changed, but you'll see that in my comments.

8 I did appreciate the opportunity to make comment,
9 so that those participating in the rulemaking process will
10 see where I comment on the current interpretations of some
11 of those standards within the recycler regulations that I
12 think have been exceeded. For example, within dealer
13 co-ops, you're requiring them to supply the records. The
14 original statute says that you may inspect records and the
15 Department has chosen to ignore that and basically
16 confiscates records without a chain of command process.
17 So these are a few of the things that I've noticed within
18 the proposals.

19 Secondly, you go in and you change the definition
20 or you change the reference from "the Division" to "the
21 Department". The Division is responsible for this
22 program. To have people outside of the Division working
23 on this program, like I think has happened with these
24 proposed regulations, doesn't follow the statutory
25 authority for the Department, so I would recommend that

1 change those and reverse those.

2 And if somebody else has got a few things to say,
3 I'm sure I'll have more as we go along. Thank you.

4 KRIS CHISHOLM: Thank you for your comment, Mr.
5 Lang.

6 (Pause in proceedings from 9:11 a.m. to
7 9:13 a.m.)

8 CSILLA RICHMON: It looks like we have another
9 hand in the Zoom room, so I'm going to go ahead and unmute
10 Alina.

11 ALINA BEKKERMAN: Hi there. Thank you very much.
12 My name is Alina Bekkerman calling with the San Francisco
13 Environment Department and the CRV Coordinator.

14 I'd be curious to address the timeline issue.
15 Article 2, Dealers, Section 2371, Dealer Registration
16 calls out that dealers will have to register within 30
17 days of the effective date of this section. And the
18 effective date of this section, to my understanding, is
19 January 1, 2025. Has that changed as a result of the
20 continued pushing out of the timeline as well as the
21 adoption of the regulations?

22 KRIS CHISHOLM: Good morning, Ms. Bekkerman.
23 This is Kris Chisholm with CalRecycle. I just want to
24 address that this is an APA rulemaking hearing where we're
25 here to receive comments. It's not an area or space for

1 dialogue or a Q&A. So if I can interpret your comment as
2 you have concerns about the timeline for when dealers are
3 registered, vis-a-vis the effective date of the rest of
4 the dealer cooperative statute, is that correct?

5 ALINA BEKKERMAN: Yeah, it's, at this point,
6 unclear in terms of the timeline for dealers to register
7 nor is it stated what the timeline will be. So it's a
8 concern, given that we are in the end of April today and
9 the adoption of the regulations may take longer, that
10 there's no clear indication around when the effective date
11 will be. Thank you.

12 KRIS CHISHOLM: Thank you for your comment.

13 We can start the 30-minute clock as often as you
14 would like Jeff.

15 (Pause in proceedings from 9:15 a.m. to
16 9:19 a.m.)

17 KRIS CHISHOLM: Good morning. I just want to
18 remind everyone that we will be shutting the APA
19 rulemaking hearing if we don't have any comments for a
20 period of 30 minutes.

21 CSILLA RICHMON: It looks like we have a hand in
22 the Zoom room. I'm going to ahead and unmute Alina.

23 ALINA BEKKERMAN: Thank you. With regard to
24 dealer registration, there is no communication currently
25 in the regulations around how dealers will be enforced to

1 register and the requirements around registration.
2 Whether dealer is a registered dealer or not a registered
3 dealer within an area seems to be omitted from the
4 regulations, and further, any penalties that will be
5 levied are specific to stewardship plans and compliance
6 with stewardship plans. It does not look like there is
7 formation about dealer registration and what happens if a
8 dealer does not register, in terms of how CalRecycle will
9 inform dealers about their lack of registration. I'd
10 really like clarification on that further rulemaking.

11 KRIS CHISHOLM: So a brief reminder, this is an
12 APA rulemaking hearing involving the reception of comments
13 related to the proposed regulations. It's not really a
14 forum for Q&A or dialogue. This is really an opportunity
15 for people to present their comments to the Department to
16 ensure that the Department is listening to them. And any
17 responses to those comments will be provided in the Final
18 Statement of Reasons, which will be published with the
19 rulemaking file once approved.

20 But thank you for your comment. If you'd like to
21 rephrase your concern or question back into a comment,
22 please feel free to do so. Just raise your hand again on
23 Zoom. I think we have plenty of availability to receive
24 that comment.

25 CSILLA RICHMON: I see Alina still has her hand

1 raised, so I'm going to go ahead and unmute her.

2 ALINA BEKKERMAN: Thanks for the opportunity to
3 reframe. Yeah, I think simply it is that there's missing
4 context around dealer registration.

5 KRIS CHISHOLM: Thank you.

6 CSILLA RICHMON: We have another hand in the Zoom
7 room. I'm going to go ahead and unmute Leonard.

8 LEONARD LANG: Yes. Thank you. First, I would
9 agree with Ms. Bekkerman that the process for dealer
10 registration is burdensome and confusing, but she also
11 brought up enforcement. In the comments I'll be
12 submitting, I've noted that should there be a hearing
13 required for enforcement, that it be changed from what's
14 being proposed, the informal hearing process Government
15 Code 1145 -- 445.10 through 20 or 60 and go to the formal
16 hearing process. If these dealer co-ops are going to be
17 Investing a lot of time and money, they need the
18 protections that come from the separation of powers in the
19 formal hearing and the rights of discovery, which are not
20 provided for in the informal hearing. So those are two
21 things that are very bad for recyclers over the years. So
22 I recommend that the deal co-ops insist on formal hearings
23 should there be. Thank you.

24 KRIS CHISHOLM: Thank you for your comment, Mr.
25 Lang.

1 SUSAN COLLINS: Thank you. Good morning, I
2 apologize for being late. I have several comments,
3 because there were several things that I noticed this time
4 reading through, which --

5 THE COURT REPORTER: This is the reporter. Can
6 she identify who she is.

7 SUSAN COLLINS: Oh, yes, of course. I'm sorry.
8 My name is Susan Collins. I'm the President of the
9 Container Recycling Institute. So an observation that I
10 will state as a comment to the extent that I can, but some
11 of these things I wondered what if, and I'm not sure
12 exactly how they should be addressed. So we'll try to
13 make it as clear as we can in the written comments that we
14 submit.

15 The first "what if" is what if a grocery store
16 creates a dealer co-op and refuses to let anyone else join
17 that dealer co-op? And this isn't a hypothetical. I've
18 seen something like this happen in the State of Maine,
19 where they did form a cooperative and it was larger
20 organizations that refused to let the smaller
21 organizations in, which essentially turns the co-op into a
22 weapon of anti-competitive behavior. So it could leave
23 the other stores in the area in that unserved zone high
24 and dry having to accept containers in store, you know,
25 sort of giving them an extra burden by not giving them an

1 opportunity to join an existing co-op that exists in that
2 area. So phrasing that as a -- as a comment and trying to
3 figure out where in the law -- or where in the regulations
4 it would be appropriate to add a requirement for the
5 dealer co-op to invite all dealers in the unserved zone to
6 join and do so in good faith. So that's comment number
7 one.

8 Is it okay if I just keep commenting?

9 Okay. Tell me if I'm going on too long or
10 whatever. On the bottom of page four Item 9, the last
11 couple of sentences on the bottom of page four, a
12 proposed -- it has to do with a proposed recycling center
13 not being able to apply to be a redemption center in that
14 area, if there's already a dealer co-op in that area. And
15 so I wondered, and again this is a question in my mind
16 that I have to learn to phrase into a comment for purposes
17 of these regulations. But that -- does that give
18 supremacy or priority to the dealer co-ops? Can a dealer
19 co-op form and kick out an existing redemption center?
20 And it -- I've -- I saw a little bit of a head shake
21 there, but I didn't feel like that was clear to me when I
22 was reading the regulations.

23 In light of the two new grant applications that
24 were -- or two new applicants that were granted a grant
25 last week on the workforce development, I saw that those

1 two programs were donation-only programs. They were not a
2 situation where a person could go to a redemption center
3 or a redemption location and actually get the redemption,
4 get their money back. And I notice that all throughout
5 these regulations the word "redemption" is used.
6 Traditionally, I have never seen the word redemption to
7 mean you are forced to only give a donation and you have
8 to give it to whatever organization that redemption
9 location is associated with.

10 So I wonder if we have like a creeping standard
11 where the word "redemption" is being used in this new way.
12 That's another comment that I see throughout that it could
13 exist throughout the entire set of regulations. I have I
14 think more places where I've seen that.

15 Having to do with the word "comparable",
16 providing comparable service, it's on page 13. There are
17 a number of sections that talk about comparable and a
18 number of different measures that are used. Comparable
19 means this, comparable also means that. I noticed this
20 one word "any" under B -- capital "B", little "i" -- two
21 little "i"s, where it says "Redemption location or
22 locations within one mile of any dealer member in the
23 unserved convenience zone." Any dealer could mean a
24 dealer along the outskirts, the perimeter, of that zone.
25 And then if you add another mile from that dealer, you're

1 now looking at a zone size that's not one mile radius, but
2 one that's two miles in radius.

3 And once you've done that, I actually drew myself
4 a picture to work it out, which I don't have with me. But
5 I realized that you could have one redemption location
6 that serves several zones because that one redemption
7 location would be within one mile of any dealer, not
8 within one mile of the center of the zone, which is the
9 way the zone is currently defined. So that one word, the
10 word "any" completely redefines the zone size for dealer
11 co-ops and for dealer co-ops only. And I don't know if
12 that was the intent, but that doesn't -- it doesn't seem
13 comparable at all.

14 Another concern is at the very bottom of the
15 page, page 13, Item E, material types, not all redemption
16 locations are required to redeem all beverage container
17 material types. I could see that as being reasonable if
18 it was the odd material types that are like less than one
19 percent of the program, like bag and box, or septics, or
20 pouches to say this location doesn't accept those. You
21 have to go somewhere else within the zone to redeem those.

22 But what if it was we're only accepting aluminum
23 at this location and we're not accepting PET, or glass, or
24 HDPE. That is in no way comparable. So we'll be
25 commenting on that, that that is not even close to

1 comparable. Comparable would have to at least be
2 accepting 95 percent of the containers that are typically
3 accepted through redemption points. I can -- I can deal
4 with the oddballs having to go somewhere else, but
5 otherwise it's not comparable at all.

6 Just a high five. It's very cool on page 14 that
7 the performance standard is 80 percent of sales. That's
8 wonderful. Love it. I do notice though that even that
9 can be manipulated. Again, if there's a situation where a
10 grocery store forms a co-op and doesn't allow any of the
11 other dealers within that zone to also join the co-op,
12 then the sales that they have to count for that co-op are
13 only their store sales. So capturing 80 percent of their
14 store sales is easier than capturing 80 percent of the
15 sales within the zone.

16 I have mixed feelings on Item B at the bottom of
17 the page on page 14. The redemption limits, those would
18 not be comparable to existing load limits, not comparable.
19 And at the same time, it's very typical for RVMs to have
20 limits of how many containers somebody can put in an RVM
21 in order to shorten the wait time, so that you don't have
22 one person dominating the RVM putting 3,000 containers in
23 it. So I have mixed feelings about that one. It makes
24 sense and is reasonable to have a limitation like 240
25 containers for RVMs, but it wouldn't be necessary to have

1 a limit for something like bag drop. So on that -- much
2 more nuanced things might need to be written in that
3 section.

4 Another high five is on page 15, the review
5 period was shortened from 120 days to 90 days. And we've
6 talked about how important it's going to be to get these
7 plans approved to get the stores out of limbo and into
8 these dealer co-ops. I noticed elsewhere it was
9 clarified, another high five to CalRecycle, for clarifying
10 that in the limbo period all of the stores are required to
11 take back in store.

12 Stewardship plan updates, nothing has to be
13 updated for five years. And I think that more -- there's
14 going to be a need to do more adjustments in the first
15 couple of years of this program. This is something new
16 that's never been tried anywhere else in the world, so
17 we're -- we don't know how it's going to go and we don't
18 know what kind of issues we'll come up.

19 At the top of the page on page 16, I know -- I
20 flagged the word "redeem" and noted "not donate". I think
21 that was the point at which I was hoping that these
22 donation-only programs wouldn't count as they -- you know
23 to make a zone served, because if you're not offering
24 redemption, if you're not offering people their money
25 back, that's not service. It's a type of service. It's

1 one thing if you have the option to donate or redeem, but
2 you have to have the service of actually being able to get
3 your money back.

4 I was also concerned about that on page 18 at the
5 top of the page, item number 4. The method of redemption
6 concerned that -- but again that could be sort of creeping
7 language or could be meant to have somebody say we're
8 offering redemption because people can come and donate
9 their containers and donating containers is not
10 redemption.

11 We appreciated the changes to the definition of
12 downtime, so that folks who are servicing RVs are going
13 to take at least 15 minutes to empty them out and service
14 them and that could of thing. So we appreciated that.
15 Another high five.

16 And I wondered if these donation-only programs
17 are eligible to receive handling fees, because I don't
18 think that was specifically called out. Sorry. That was
19 on page 22 when I was reading through the handling fee
20 section.

21 And I may be coming to the end. This is an
22 important one on page 42 near the end. Under programs and
23 drop-off collection programs, the first couple of
24 sentences there, especially Item A2. Hopefully, but it's
25 not clear enough to me yet, so we'll be commenting on

1 this, that this would allow delayed payments for bag drop
2 programs. Bag drop and certain RVM functions typically
3 have a delay. Like, if there's -- if an RVM allows people
4 to donate to the charity of their choice, and if that's
5 part of the program of the RVM, that doesn't typically
6 happen instantaneously.

7 Similarly, if somebody drops off containers in a
8 bag in a bag drop program, the refund doesn't happen
9 instantaneously. I'm not absolutely sure that that's
10 super, super clear that that's all allowable in item
11 number 2 here. I think it allows for delayed payments for
12 bag drop, but I'm not super clear.

13 Also, I found the language strange at the end of
14 that sentence, "For every empty beverage container not
15 donated to the dealer cooperative." I've never seen a
16 situation where you donate to a dealer cooperative.
17 Again, dealer cooperatives don't exist anywhere else in
18 the world. But typically, what happens under a donation
19 program is that you donate to a charity of your choice and
20 that language is not included in this section and it's
21 necessary for that to be included.

22 And that concludes my questions I believe -- or
23 my comments. Thank you.

24 KRIS CHISHOLM: Thank you for your comment.

25 As a reminder, if you'd like to make a public

1 comment on the SB 1013 dealer cooperative proposed
2 regulations, please come to the podium or raise your hand
3 in Zoom. If -- we're going to be keeping the room open
4 till at least 10 o'clock today. If we don't receive any
5 further comments, we will conclude the hearing on or after
6 10 o'clock. All right. Thank you.

7 (Pause in proceedings from 9:13 a.m.
8 to 9:40 a.m.)

9 CSILLA RICHMOND: As a reminder to ensure that
10 CalRecycle can receive everyone's comments, please follow
11 these rules when making oral comments. Please begin by
12 giving your name and affiliation. And if there are
13 several speakers with the same comment, please appoint a
14 spokesperson.

15 To make a comment in person, please line up at
16 the podium. To make an oral comment via Zoom, please
17 raise your hand and the host will unmute you. Please
18 submit written comments to the CalRecycle public comment
19 portal by the end of today's hearing.

20 (Pause in proceedings from 9:54 a.m.
21 to 10:00 a.m.)

22 CSILLA RICHMOND: As a reminder to ensure that
23 CalRecycle can receive everyone's comments, please follow
24 these rules when making oral comments. Please begin by
25 giving your name and affiliation. If there are several

1 speakers with the same comment, please appoint a
2 spokesperson. To make a comment in person, please line up
3 at the podium. To make an oral comment via Zoom, please
4 raise your hand and the host will unmute you. Please
5 submit written comments to the CalRecycle public comment
6 portal by the end of today.

7 KRIS CHISHOLM: Good morning, everyone. I just
8 want to remind everyone that if we don't receive any
9 further comments, we will be closing the rulemaking
10 hearing at 10:15, so 15 more minutes.

11 Thank you.

12 CSILLA RICHMOND: It look like we have a hand
13 raised in the Zoom room. I'm going to go ahead and ask
14 Leonard to unmute.

15 LEONARD LANG: Yes. Thank you. This is not to
16 extend your clock. It's not my purpose. But we were
17 supposed to identify ourselves. I advise recyclers and
18 processors around the state and I've got experience that
19 goes back to the beginning of this program. You can reach
20 me through LinkedIn, Leonard Lang.

21 Thank you.

22 KRIS CHISHOLM: Thank you for your comment, Mr.
23 Lang.

24 No, it did not. This will close at 10:15.

25 (Pause in proceedings from 10:01 a.m.

1 to 10:10 a.m.)

2 CSILLA RICHMOND: It looks like we have a hand
3 raised in the Zoom room. I'm just go ahead -- I'm going
4 to go ahead and ask Alina Bekkerman to unmute.

5 ALINA BEKKERMAN: Thanks. Going to section 2382,
6 dealer cooperative operation, H, "A dealer cooperative may
7 terminate the membership of a dealer member." It does not
8 seem to correlate to any other update that's required by a
9 dealer cooperative in section 2377 of the membership plan
10 updates. So if a dealer cooperative terminates a member,
11 it does not look like there's anything that that member is
12 required to do, and that the dealer stewardship plan --
13 dealer cooperative stewardship plan provisions in section
14 2377 require any updates, if a dealer member is
15 terminated. So it leaves dealer members out of the deal
16 cooperative, if they're terminated, without any additional
17 requirements for them and without any additional notice
18 that CalRecycle will receive. So it seems like an
19 opportunity for dealers who are excluded to go under the
20 radar.

21 KRIS CHISHOLM: Thank you for your comment.

22 We'll keep the hearing open for an additional
23 five minutes. So if there are any further comments, now
24 is a great time.

25 (Pause in proceedings from 10:12 a.m.)

1 to 10:15 a.m.)

2 CSILLA RICHMOND: It looks like we have a hand
3 raised in the Zoom room. I'm going to go ahead and ask
4 you to unmute.

5 GREG LANZ: Hi there. This is Greg with
6 Recycletek. You can hear me okay?

7 CSILLA RICHMOND: Yeah, we can hear you.

8 GREG LANZ: Yeah. I received feedback from the
9 Department that a single-feed RVM system in a dealer
10 managed by an operating recycling center considers the
11 zone as served. And when I look at the draft regulations
12 for the requirement for dealer co-ops to provide 80
13 percent of the beverage containers amount of redemption
14 amount at a minimum of 80 percent, I was -- my comment is
15 that I think there should be language in here that refers
16 to a zone not being served by a single-feed RVM in a
17 dealer, because my understanding is those single-feed RVM
18 systems certainly would not be able to support 80 percent
19 redemption rates.

20 KRIS CHISHOLM: Thank you for your comment.

21 GREG LANZ: Thank you.

22 (Pause in proceedings from 10:17 a.m.

23 to 10:19 a.m.)

24 CSILLA RICHMOND: It looks like we have another
25 hand raised in the Zoom room. I'm going to go ahead and

1 ask you to unmute.

2 ALINA BEKKERMAN: Hi. This is Alina Bekkerman.
3 Looking at the first section of definitions, Item I, "A
4 redemption location..." -- or, "...redemption location or
5 redemption site is not required to obtain a certification
6 nor registration number from the department." A comment
7 and a concern here that redemption sites that are not
8 tracked and not part of the registration for a stewardship
9 program will go in unreported, and overall reporting for
10 the stewardship program might lack sufficient
11 documentation.

12 Thank you.

13 KRIS CHISHOLM: Thank you for your comment.

14 I just want to let everyone know that we are
15 electing to keep the room open for another 10 minutes to
16 hopefully capture any more possible public comments that
17 people might have. Thank you.

18 (Pause in proceedings from 10:20 a.m.
19 to 10:22 a.m.)

20 CSILLA RICHMOND: It looks like we have another
21 hand raised in the Zoom room. I'm going to go ahead and
22 ask you to unmute.

23 GREG LANZ: Hi again. Greg from Recycletek. I
24 just have one more comment. I'd like to thank you for the
25 opportunity today. Under the definition on page five for

1 innovative method of redemption includes both of the
2 following.

3 Number one, mobile collection programs in which
4 beverage containers are picked up from consumers. In my
5 understanding, that's a very limited definition that does
6 not provide for the flexibility of mobile programs to
7 arrive at locations to receive consumers that are
8 delivering CRV containers. So my comment is that the
9 definition of a mobile collection program should be
10 broadened to provide the flexibility of operating in
11 different locations to not only pick up from consumers but
12 to receive containers from consumers.

13 Thank you.

14 KRIS CHISHOLM: Thank you for your comment.

15 (Pause in proceedings from 10:23 a.m.
16 to 10:31 a.m.)

17 CSILLA RICHMOND: Thank you all for joining us
18 today. If you would like to stay informed on the status
19 of the SB 1013 dealer registration and dealer cooperatives
20 proposed regulations, please subscribe to the listserv
21 shown in the presentation slide.

22 Thank you. That brings today's hearing to an
23 end.

24 (Thereupon the hearing adjourned at 10:31 a.m.)
25

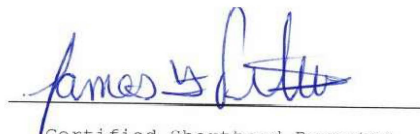
CERTIFICATE OF REPORTER

I, JAMES F. PETERS, a Certified Shorthand
Reporter of the State of California, do hereby certify:

That I am a disinterested person herein; that the
foregoing California Department of Recycling meeting was
reported in shorthand by me, James F. Peters, a Certified
Shorthand Reporter of the State of California, and was
thereafter transcribed, under my direction, by
computer-assisted transcription;

I further certify that I am not of counsel or
attorney for any of the parties to said meeting nor in any
way interested in the outcome of said meeting.

IN WITNESS WHEREOF, I have hereunto set my hand
this 5th day of May, 2024.



Certified Shorthand Reporter
For The State of California

JAMES F. PETERS, CSR

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