

Comment Code	Category	Submit Method	Commenter Name	Commenter Affiliation	Comment	CalRecycle's Response
I- 1 -1	2375.4. Stewardship Plan Substantive Contents	Email	Leonard Lang		Section 2375 (a) (4) The renote adds additional requirements that are not authorized by statute. There is no requirement for websites or conditions imposed on those websites.	CalRecycle rejects this comment. The comment misstates that the changed language in this version of the proposed regulation text adds an additional requirement relating to websites or conditions imposed on those websites. Adding the website address is a non-substantial change to the regulations without any change in regulatory effect. The requirement for a submitted stewardship plan to comply with the Web Content Accessibility Guidelines (WCAG) 2.0 published in 2008 by the World Wide Web Consortium has not been altered in any way. The only change being made in this version of the proposed regulation text is adding the website address to the regulation text, rather than just including the website address in the supporting rulemaking documents, to increase clarity for dealer cooperatives. Imposing requirements in regulation not set out in statute does not necessarily violate the Administrative Procedure Act's standard of consistency (Gov. Code section 11349(d)). Creating requirements through regulation is inherently part of the rulemaking process so long as the requirements are reasonably designed to aid a statutory objective and do not conflict with or contradict any statutory provision. Requiring a submitted stewardship plan posted online to comply with the Web Content Accessibility Guidelines (WCAG) 2.0 published in 2008 by the World Wide Web Consortium is designed to aid the statutory objective of increasing consumer convenience and access to CRV redemption to increase California's recycling rates to 80% and reduce litter. The provision is reasonable because accessibility will increase the number of consumers that can access the posted stewardship plan that contains information about the redemption offered by the dealer cooperative. It does not conflict with or contradict any statutory provision within the California Beverage Container Recycling and Litter Reduction Act.
I- 1 -2	2376. Stewardship Plan Review and Approval or Disapproval; Operational Noti	Email	Leonard Lang		Section 2376 (b) We are pleased to see that our recommendation was accepted and the section deleted.	CalRecycle rejects this comment as it does not offer any specific objection or recommendation to the changes in this version of the proposed regulation text, nor to the procedures used in noticing and offering for comment this version of the proposed regulation text.

I- 1 -3	2377. Stewardship Plan Five-Year Updates	Email	Leonard Lang		Section 2377 By changing the words May to Shall the department has not clarified ambiguity, it has imposed a major change, which in my opinion, should require a 45-day renotece. This affects the whole process of application and determination for rejection of the application. The standards imposed should be identical to those for the application of Certified Recycling Centers. We fail to find authority for this requirement.	CalRecycle rejects this comment. The purpose of this amendment is to remove any ambiguity as to what action CalRecycle will take if it concludes that a dealer cooperative cannot implement the applicable requirements of the Act and regulations without updating a stewardship plan. In that instance, the department will reject a determination that a stewardship plan update is unnecessary. Furthermore, the comment misstates when a 45-day public comment period is required. CalRecycle has noticed a 15-day public comment period for this version of the regulation text. 15-day public comment periods are permitted for substantial changes that are sufficiently related (1 CCR sections 40 and 42; Gov. Code section 11346.8). Changing "may" to "shall" regarding what action CalRecycle will take if CalRecycle concludes that a dealer cooperative cannot implement the applicable requirements of the Act and regulations without updating a stewardship plan is sufficiently related because ""a reasonable member of the directly affected public could have determined from the notice that these changes to the regulation could have resulted"" (1 CCR section 42). Specifically, a reasonable member of the directly affected public could have made this determination because the criteria for CalRecycle rejecting the decision not to update remains the same and is therefore foreseeable. The change is merely that CalRecycle's discretion to invoke the criteria is now mandatory rather than permissive. This provision provides specific procedures for five-year updates to dealer cooperative stewardship plans that are unique to this new beverage container recycling entity. The provision is necessary to implement PRC section 14578.5(c)(1), which requires that the dealer cooperative redemption program be sufficient with redemption opportunities for consumers with comparable consumer convenience to recycling centers and pilot projects. While the statute is specific that the redemption plan should be comparable, it is not required that dealer cooperatives operate in the exact same manner as recycling centers. Making dealer cooperative provisions the same as recycling center provisions with regard to five-year updates to stewardship plans is contrary to the Act, because PRC sections 14578 and 14578.5 require a dealer cooperative to have a stewardship plan, whereas the Act does not require recycling centers to have stewardship plans. Imposing requirements in regulation not set out in statute does not necessarily violate the Administrative Procedure Act's standard of consistency (Gov. Code section 11349(d)). Creating requirements through regulation is inherently part of the rulemaking process so long as the requirements are reasonably designed to aid a statutory objective and do not conflict with or contradict any statutory provision. Five-year updates to stewardship plans are designed to aid the statutory objective of increasing consumer convenience and access to CRV redemption to increase California's recycling rates to 80% and reduce litter. The provision is reasonable because a stewardship plan that is never updated would not reflect the redemption needs of a changing populace within a convenience zone. It does not conflict with or contradict any statutory provision within the California Beverage Container Recycling and Litter Reduction Act.
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I- 1 -4	2381. Reporting	Email	Leonard Lang		Section 2381 There was no authority for the original proposed regulation therefore any modification still lacks authority.	CalRecycle rejects this comment. The only change being made in section 2381 is adding the website address of the Web Content Accessibility Guidelines (WCAG) 2.0 published in 2008 by the World Wide Web Consortium. Adding the website address is a non-substantial change to the regulations without any change in regulatory effect. The requirement for a submitted quarterly report to comply with the Web Content Accessibility Guidelines (WCAG) 2.0 published in 2008 by the World Wide Web Consortium has not been altered in any way. The only change being made in this version of the proposed regulation text is adding the website address to the regulation text, rather than just including the website address in the supporting rulemaking documents, to increase clarity for dealer cooperatives. Imposing requirements in regulation not set out in statute does not necessarily violate the Administrative Procedure Act's standard of consistency (Gov. Code section 11349(d)). Creating requirements through regulation is inherently part of the rulemaking process so long as the requirements are reasonably designed to aid a statutory objective and do not conflict with or contradict any statutory provision. Requiring a submitted quarterly report that is posted online to comply with the Web Content Accessibility Guidelines (WCAG) 2.0 published in 2008 by the World Wide Web Consortium is designed to aid the statutory objective of increasing consumer convenience and access to CRV redemption to increase California's recycling rates to 80% and reduce litter. The provision is reasonable because accessibility will increase the number of consumers that can access the quarterly report that contains information about the redemption offered by the dealer cooperative. It does not conflict with or contradict any statutory provision within the California Beverage Container Recycling and Litter Reduction Act.
I- 1 -5	2382. Dealer Cooperative Operation	Email	Leonard Lang		Section 2382 This amendment seems to recognize that the original proposal lacked clarity and is therefore welcome.	CalRecycle rejects this comment as it does not offer any specific objection or recommendation to the changes in this version of the proposed regulation text, nor to the procedures used in noticing and offering for comment this version of the proposed regulation text.
I- 1 -6	2385. Stewardship Plan Revocation; Enforcement Mechanisms	Email	Leonard Lang		Section 2385 I fail to see how this amendment promotes clarity, in fact, I believe it does just the opposite.	CalRecycle rejects this comment. The regulatory language has been changed to specify that failing to comply with any applicable requirement of the Act or these regulations constitutes grounds for CalRecycle to require a dealer cooperative to take corrective action. This change promotes clarity by placing the regulated entity on notice that the consequence of noncompliance of a stewardship plan results in the imposition of corrective action.
I- 1 -7	2385. Stewardship Plan Revocation; Enforcement Mechanisms	Email	Leonard Lang		(A)(2)(b) Permits the Division to impose additional reporting without adopting those reporting requirements or stating the authority for them. It should be rejected.	CalRecycle accepts this comment and has made the following nonsubstantial change: the final proposed regulation text clarifies that the additional reporting requirements only include additional reporting of any of the components listed in section 2381. This provides clarity to dealer cooperatives by putting them on notice regarding what kinds of information can be required to be reported as part of corrective action. The statutory authority for this requirement is PRC section 14578.5(c)(6), which requires a dealer cooperative to "Provide reports as required by the department, which may include, but are not limited to, ... any other relevant information the department requests in the form and manner that the department may prescribe." Including additional reporting of the components listed in section 2381 as part of corrective action is necessary for CalRecycle to verify the dealer cooperative's compliance with any applicable provision of the Act or regulations. This change is nonsubstantial because it clarifies, without materially altering, the requirements, rights, responsibilities, conditions, or prescriptions contained in the original text (1 CCR section 40; Gov. Code section 11346.8). Specifically, it is nonsubstantial because it merely cross-references existing reporting components listed in section 2381, rather than creating any new type of reporting.

I- 1 -8	2385. Stewardship Plan Revocation; Enforcement Mechanisms	Email	Leonard Lang		Section (b) states that failing to comply with the corrective action is grounds for revocation, all or in part, any allegation made by the department should be subject to adjudication before implementation of revocation. An allegation is not fact until it's been adjudicated. No provisions have been proposed or adopted for this purpose.	CalRecycle rejects this comment. The comment misstates that no hearing provisions have been proposed for a revocation hearing. In proposed section 2385(c)-(f), the following revocation hearing procedures have been proposed to ensure due process: written notice to the dealer cooperative of intent to revoke a stewardship plan, ability for a dealer cooperative to request a hearing to contest the grounds for the revocation, requiring a hearing to be conducted pursuant to the informal hearing provisions of the Administrative Procedure Act, and the timeframe in which the Director or the Director's designee must issue a written decision.
I- 1 -9	2385. Stewardship Plan Revocation; Enforcement Mechanisms	Email	Leonard Lang		Section (d) makes provisions for untimely requests for a hearing but fails to adopt standards allowing for their usual arbitrary determinations. Standards should be adopted as a part of this package.	CalRecycle rejects this comment. The comment misstates that no hearing standards have been proposed for a revocation hearing. In proposed section 2385(c)-(f), the following revocation hearing standards have been proposed to ensure due process: written notice to the dealer cooperative of intent to revoke a stewardship plan, ability for a dealer cooperative to request a hearing to contest the grounds for the revocation, requiring a hearing to be conducted pursuant to the informal hearing provisions of the Administrative Procedure Act, and the timeframe in which the Director or the Director's designee must issue a written decision.
I- 1 -10	2386. Penalties and Interest Charges	Email	Leonard Lang		Section 2386 refers to the right to a hearing and specifies conditions but those conditions do not match the standards adopted in section 2130. Therefore all standards referred to should not be adopted in this section but refer to section 2130 instead.	CalRecycle rejects this comment. The Notice of Violation and related hearing provisions for dealers and dealer cooperatives provides specific enforcement standards unique to these beverage container recycling entities. This provision is necessary to implement PRC section 14578.5(b)(1), which requires CalRecycle to adopt regulations necessary for the implementation and enforcement of the dealer and dealer cooperative provisions. While PRC section 14578.5(c)(1) requires that the dealer cooperative redemption program be sufficient with redemption opportunities for consumers with comparable consumer convenience to recycling centers and pilot projects, it is not required that dealers and dealer cooperatives be enforced in the exact same manner as recycling centers. These enforcement procedures must be different since they are tailored to SB 1013's creation of a new beverage container recycling framework for dealers and dealer cooperatives. Making dealer and dealer cooperative enforcement provisions the same as recycling center enforcement provisions in section 2130 is therefore not necessary and is contrary to effectuating SB 1013's creation of a new beverage container recycling framework for dealers and dealer cooperatives.
I- 1 -11	2530. Reporting	Email	Leonard Lang		Section 2530(d), (f) makes the addition of Dealer Cooperatives. These entities operate as Certified Recycling Centers that are created by the stewardship plan. It is not nor should it be considered a separate type of operator. They should be treated as and certified as Recycling Centers.	CalRecycle rejects this comment as it does not offer any specific objection or recommendation to the changes in this version of the proposed regulation text, nor to the procedures used in noticing and offering for comment this version of the proposed regulation text.
I- 1 -12	2535. Payments to Consumers Curbside Programs Community Service Programs an	Email	Leonard Lang		Section 2535, Again this section is amended to include Dealer Cooperative which should be treated as a Recycling Center. Leonard Lang. 1713 Mimosa Ln. Euless, TX 76039 714-321-6607 Cell	CalRecycle accepts this comment and has made the following nonsubstantial change: section 2535 has been removed from the final proposed regulation text. While section 2535 was included in the version of the proposed regulation text noticed on February 24, 2025, no changes were indicated in strikeout or underline because no revisions to existing section 2535 are proposed to be made. This change is nonsubstantial because it clarifies, without materially altering, the requirements, rights, responsibilities, conditions, or prescriptions contained in the original text (1 CCR section 40; Gov. Code section 11346.8). Specifically, it is nonsubstantial because it is only a typographical correction that removes plain text that had no regulatory effect.

I- 2 -1	2385. Stewardship Plan Revocation; Enforcement Mechanisms	Website	Alina Bekkerman		Thank you for the opportunity to provide feedback on the latest version of SB1013 Dealer Cooperative regulations. Enforcement Section 2385 - Changes to the regulations note "if a dealer demonstrates good cause for untimely hearing". Please define 'good cause' as it relates to this section, ensuring that dealers are held accountable and not provided leniency without a clear demonstration of what 'good cause' may be. Specifically, how this legal definition would be addressed, "A substantial reason, taking into account the prejudice or irreparable harm a party will suffer if a hearing is not held".	CalRecycle rejects this comment. This amendment reduces the department's discretion regarding when an untimely hearing request will result in the right to a hearing being deemed waived. Rather than giving the department total discretion by stating the right to a hearing "may" be waived by the department in the event there is an untimely hearing request, the language now states in the event of an untimely hearing request, the right to a hearing "shall" be deemed waived, unless the dealer cooperative demonstrates good cause for the untimely hearing request. Codifying the comment's suggested definition for "good cause" into regulation would unnecessarily constrain CalRecycle's ability to allow a hearing to go forward in the event of an untimely hearing request. Public policy supports deciding cases on the merits rather than not allowing the case to be heard for procedural reasons, such as an untimely hearing request. Therefore, a flexible meaning of "good cause" is necessary. If a hearing request is only a few minutes untimely, then a nonsubstantial but valid reason may constitute good cause, whereas if the hearing request is a week late, then a more substantial reason would be necessary to constitute good cause.
I- 2 -2	2375.6. Stewardship Plan Performance Standards	Website	Alina Bekkerman		While these comments are for the plain text not up for discussion, I'd like to submit them: The Dealer Cooperative regulations require a stewardship plan to demonstrate how 100% of containers sold by dealer members can be redeemed, while only requiring 10 hours per week. The 100% capacity requirement doesn't line up with the minimum number for hours of operation, given that either additional hours would be required or the percentage of containers would need to be reduced.	CalRecycle rejects this comment as it does not offer any specific objection or recommendation to the changes in this version of the proposed regulation text, nor to the procedures used in noticing and offering for comment this version of the proposed regulation text.
I- 2 -3	2377. Stewardship Plan Five-Year Updates	Website	Alina Bekkerman		There is a requirement for dealers to verify information annually, however, the stewardship plan is only reviewed every 5 years (Section 2377). There seems to be a discrepancy given that stewardship plans may need to be updated annually given changes in dealer operations and convenience zones. Recommending a more frequent review of the dealer stewardship plan may help ensure dealer cooperatives are consistently collaborating with dealers and reporting changes to the Department. Thank you for your considerations of these comments and your work on the regulations.	CalRecycle rejects this comment as it does not offer any specific objection or recommendation to the changes in this version of the proposed regulation text, nor to the procedures used in noticing and offering for comment this version of the proposed regulation text.
C- 1 -1	Unclassified	Website	prem bhardwaj	ultra gasoline	No comments	CalRecycle rejects this comment as it does not offer any specific objection or recommendation to the changes in this version of the proposed regulation text, nor to the procedures used in noticing and offering for comment this version of the proposed regulation text.

C- 2 -1	Unclassified	Website	Jeff Donlevy	Mings Resources	Cal Recycle, Ming's Resource Corp would like to submit the attached comments on the proposed Final Regulations for the Dealer Cooperatives. Staff has done a lot of work on these regulations, with most that Ming's can support. There are, however, several that lack authority, are burdensome, costly, and will likely deter or delay the roll of dealer cooperatives. Several of the regulations are more in line with the requirements of a solid waste franchise agreement or could be seen as unauthorized legislative mandates.	CalRecycle rejects this comment as it does not offer any specific objection or recommendation to the changes in this version of the proposed regulation text, nor to the procedures used in noticing and offering for comment this version of the proposed regulation text.
C- 2 -2	Unclassified	Website	Jeff Donlevy	Mings Resources	Ming's is requesting several of the proposed regulations be removed to create a smoother pathway for grocer co-ops to form and operate.	CalRecycle rejects this comment as it does not offer any specific objection or recommendation to the changes in this version of the proposed regulation text, nor to the procedures used in noticing and offering for comment this version of the proposed regulation text.
C- 2 -3	Unclassified	Website	Jeff Donlevy	Mings Resources	Ming's is grateful for the opportunity to participate in the process to help improve the redemption program, help consumers redeem their deposits, and help recycle clean material to support the circular economy in California and with domestic reclaimers that rely on the clean material from the California redemption program. If staff has any questions or needs clarification regarding our comments, please contact me at your convenience. Thank you again for the opportunity to participate in the process. <i>Jeff Donlevy</i> General Manager <i>Mings Resources – East Bay</i>	CalRecycle rejects this comment as it does not offer any specific objection or recommendation to the changes in this version of the proposed regulation text, nor to the procedures used in noticing and offering for comment this version of the proposed regulation text.
C- 2 -4	Unclassified	Website	Jeff Donlevy	Mings Resources	Cal Recycle, Ming's Recycling and Ming's Resource East Bay (Ming's) are the largest State Certified Processors in Northern California. Mings would like to provide comments of the proposed Final Dealer Cooperative (Coop) Regulations published February 24th, 2025. The department has proposed, in many cases without authority, extensive, burdensome, and costly regulations that are unauthorized, require information on topics not even mentioned in the legislation, and lack clarity or could open the door to either ambiguous responses or interpretations by staff that could lead to delays or rejections of submitted plans.	CalRecycle rejects this comment as it does not offer any specific objection or recommendation to the changes in this version of the proposed regulation text, nor to the procedures used in noticing and offering for comment this version of the proposed regulation text.

C- 2 -5	Unclassified	Website	Jeff Donlevy	Mings Resources	The proposed regulations lack specific standardized requirements that are factual, quantifiable, measurable, or can be proven to be true or false. With the proposed regulations requiring the different applicants to provide different types of information to the department, based on assumptions, variables, or non-existent standards based on different types of services provided, the information can be interpreted by department enforcement staff to be used against the individual applicants in the future. Since multiple plans can have different plans or proposed services, enforcement for each plan will be different and not standardized with all participants, thus the proposed draft regulations should be rejected.	CalRecycle rejects this comment as it does not offer any specific objection or recommendation to the changes in this version of the proposed regulation text, nor to the procedures used in noticing and offering for comment this version of the proposed regulation text.
C- 2 -6	Unclassified	Website	Jeff Donlevy	Mings Resources	Ming's is requesting that several of the proposed regulations be removed from the regulations to make submitting and approving a plan easier for both the applicants and the staff to review. Many items being proposes as regulations, could be interpreted as legislative requirements not specifically addressed in the legislation, and in many cases the topics required under the legislation are not mentioned in the legislation, nor have adopted definitions. The recent Supreme Court decision to overturn the case of Loper Bright Enterprise v. Raimondo (aka the Chevron deference) case clearly indicates that staff should not include mandates or requirements in the form of regulations that are not clearly spelled out in the legislation. The proposed regulations attempt to implement semi-quasi legislation, if not an excessive re-write of the legislation through the emergency regulations. The proposed regulations attempt to write legislation and introduce new definitions, or conditions without adopted definitions and standards not authorized through legislation.	CalRecycle rejects this comment as it does not offer any specific objection or recommendation to the changes in this version of the proposed regulation text, nor to the procedures used in noticing and offering for comment this version of the proposed regulation text.
C- 2 -7	Unclassified	Website	Jeff Donlevy	Mings Resources	The Office of Administrative Law should reject many of the proposed regulations and support the rule of law and go through the proper legislative process to have items written into law.	CalRecycle rejects this comment as it does not offer any specific objection or recommendation to the changes in this version of the proposed regulation text, nor to the procedures used in noticing and offering for comment this version of the proposed regulation text.
C- 2 -8	2375.4. Stewardship Plan Substantive Contents	Website	Jeff Donlevy	Mings Resources	Below are the objections to the proposed regulations presented on November 13th, 2024: Section 2375.4 (a)– Methods of Redemption #11 – Methods of redemption are not addressed in legislation. This requirement lacks authority and should be removed.	CalRecycle rejects this comment as it does not offer any specific objection or recommendation to the changes in this version of the proposed regulation text, nor to the procedures used in noticing and offering for comment this version of the proposed regulation text.
C- 2 -9	2375.4. Stewardship Plan Substantive Contents	Website	Jeff Donlevy	Mings Resources	Section 2375.4 (b) – Education and Outreach #12 – This lacks authority in the Act, burdensome, and costly. This is a burdensome, costly, not required by 14578.5 and not comparable to the requirements of other program participants. This request injects staff into the judgement of the plan without authority. This section should be removed.	CalRecycle rejects this comment as it does not offer any specific objection or recommendation to the changes in this version of the proposed regulation text, nor to the procedures used in noticing and offering for comment this version of the proposed regulation text.

C- 2 -10	2375.4. Stewardship Plan Substantive Contents	Website	Jeff Donlevy	Mings Resources	Section 2375.4 (c) Dispute Resolution #13 – This lacks authority. Dispute resolution is not required by other participants, nor referenced or required in the legislation. This section should be removed.	CalRecycle rejects this comment as it does not offer any specific objection or recommendation to the changes in this version of the proposed regulation text, nor to the procedures used in noticing and offering for comment this version of the proposed regulation text.
C- 2 -11	2375.4. Stewardship Plan Substantive Contents	Website	Jeff Donlevy	Mings Resources	Section 2375.4 (d) Community Input #14 – This lacks authority in the Act, is burdensome, increases costs, and is an overreach of 14530.5. This is not comparable to the requirements of other program participants. As cooperative plans may include multiple communities, cities, and counties, the extreme burden and cost to coops is unjustified, but above all, is not required by the legislation. This requirement should be removed.	CalRecycle rejects this comment as it does not offer any specific objection or recommendation to the changes in this version of the proposed regulation text, nor to the procedures used in noticing and offering for comment this version of the proposed regulation text.
C- 2 -12	2375.4. Stewardship Plan Substantive Contents	Website	Jeff Donlevy	Mings Resources	Section 2375.4 (e) Consumer Convenience #15 – This lacks authority in the Act, is burdensome, increases costs, and is an overreach of 14530.5. This is burdensome and not comparable to the requirements of other program participants including recycling centers, Processors, or dealers not members of a dealer cooperative. Addressing consumer convenience lacks clarity in the regulation, does not have an adopted definition. This section lacks legislative authority and should be removed.	CalRecycle rejects this comment as it does not offer any specific objection or recommendation to the changes in this version of the proposed regulation text, nor to the procedures used in noticing and offering for comment this version of the proposed regulation text.
C- 2 -13	2375.4. Stewardship Plan Substantive Contents	Website	Jeff Donlevy	Mings Resources	Section 2375.4 (f)(2) 100% Capacity Requirement #16 – This section lacks legislative authority. This requirement requires the cooperative and members to disclose information protected under section 14554 and to obtain protected information from non-member dealers in the convenience zone, it's an impossible task. The statute does not require redemption capacity for 100% of containers sold. This section should be removed.	CalRecycle rejects this comment as it does not offer any specific objection or recommendation to the changes in this version of the proposed regulation text, nor to the procedures used in noticing and offering for comment this version of the proposed regulation text.
C- 2 -14	2375.6. Stewardship Plan Performance Standards	Website	Jeff Donlevy	Mings Resources	Section 2375.6 (a)(b)(c)(d) Performance Standards – This section lacks authority. Section 14578, 14578.5. Nowhere in the entire Bottle Bill does it mention, or require Performance standards, Geographic spread of redemption sites, redemption capacity of 100 percent of container sold, Redemption amount of 80 percent or average wait times for any participant nor required for the dealer cooperative plans as a condition of approval. These topics all lack clarity, require adopted definitions, and require legislation to address the specific requirements. These items should be removed as it lacks clarity, authority, and burdensome.	CalRecycle rejects this comment as it does not offer any specific objection or recommendation to the changes in this version of the proposed regulation text, nor to the procedures used in noticing and offering for comment this version of the proposed regulation text.
C- 2 -15	2375.8. Stewardship Plan Budget	Website	Jeff Donlevy	Mings Resources	Section 2375.8 (b) Funding Level and Reserves – This section lacks authority and is not required by other program participants. This is a burdensome, costly, lacks clarity or specificity, and a regulation that lacks authority and should be removed.	CalRecycle rejects this comment as it does not offer any specific objection or recommendation to the changes in this version of the proposed regulation text, nor to the procedures used in noticing and offering for comment this version of the proposed regulation text.

C- 2 -16	Unclassified	Website	Jeff Donlevy	Mings Resources	Ming's request the OAL remove all items that lacks specific authority in the legislation and items that are burdensome, costly, lack clarity of present a higher standard or requirement of participation in the program than current participants including recycling centers, processors, curbside programs, or collection programs. If you have any questions or need clarification regarding comments provided, please contact or Jeff Donlevy at jeff@mingsrecycling.com or at 916-475-9970. Thank you for your consideration and helping recycling centers, dealers, and new dealer coops return the deposits to more Californians.	CalRecycle rejects this comment as it does not offer any specific objection or recommendation to the changes in this version of the proposed regulation text, nor to the procedures used in noticing and offering for comment this version of the proposed regulation text.
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