



1 BEFORE THE CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY  
2 DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY  
3 STATE OF CALIFORNIA  
4 CRAIG CASTLETON, REGULATIONS UNIT SUPERVISOR  
5  
6

7 Public Hearing in the Matter of: )  
8 SB 54 Plastic Pollution Prevention )  
9 and Packaging Producer Responsibility )  
Act Permanent Regulations )  
\_\_\_\_\_ )

10  
11  
12  
13  
14  
15 TRANSCRIPT OF FORMAL RULEMAKING HYBRID PUBLIC  
16 HEARING, taking place at CalEPA Headquarters,  
17 1001 I Street, Sacramento, California, and via  
18 Zoom videoconference, commencing at 10:02 AM  
19 and concluding at 2:30 PM on Tuesday,  
20 October 7, 2025, reported by Nick Milana,  
21 CSR No. 13912, a Certified Shorthand Reporter  
22 in and for the State of California.  
23  
24  
25

1 APPEARANCES:

2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

- CRAIG CASTLETON, Regulations Unit Supervisor
- CSILLA RICHMOND, Regulatory Analyst
- MARCUS SANTILLANO, Program Manager
- EMMA CERVANTES, ESQ., Counsel for CalRecycle

I N D E X

SPEAKERS:	PAGE
SARAH, Olli Salumeria	10
ROXANNE SPIEKERMAN, Director of Plastics, Circular Action Alliance	11
TERI GRILL, Coalition for Protein Packaging	13
NICK PAPPAS, Californians Against Waste	15
FIONA HINES, California Public Interest Research Group	18
TEVIN HAMILTON, Physicians for Social Responsibility, Los Angeles	21
GREGORY MELKONIAN, American Institute for Packaging and the Environment	24
DR. ZOE CUNLIFFE, Black Women for Wellness	27
RENAUD DES ROSIERS, Director of Sustainability, Amy's Kitchen	31
JENNIFER FEARING, Monterey Bay Aquarium, Oceana, and Ocean Conservancy	39
AMY WOLFRUM, Director of California Policy, Monterey Bay Aquarium	43

I N D E X, continued

	SPEAKERS:	PAGE
1		
2		
3		
4	CHRISTINE BATIKIAN, Los Angeles Sanitation and Environment	44
5		
6	EMERSON DAMIANO, Zero Waste Associate, California Public Interest Research Group	46
7	ALLISON KUSTIC, Association of Plastic Recyclers	47
8	KRISTA DURLAS, Bunzl Distribution	50
9	RENEE SHARP, Senior Scientist, Natural Resources Defense Council	52
10		
11	MIHO LIGARE, Surfrider Foundation	54
12	CLIFF FELDMAN, Executive Director, West Contra Costa Integrated Waste Management Authority	59
13		
14	SIRINE RACHED, Global Alliance for Incinerator Alternatives	61
15	DR. ANJA BRANDON, Director of Plastics Policy, Ocean Conservancy	67
16		
17	HEIDI SANBORN, Director, National Stewardship Action Council	69
18	LAYLA SHARP, Environment California	72
19	KARLA GARIBAY GARCIA, Monterey Bay Aquarium	74
20	TOM HELM, Valley Improvement Projects	75
21	DAWN KOEPKE, California Manufacturers and Technology Association	82
22		
23	TERRY WEBER, American Forest and Paper Association	89
24	DAVID KRUEGER, Executive Director, Central Contra Costa Solid Waste Authority	93
25		

I N D E X, continued

SPEAKERS:	PAGE
REIT VOORHEES, Environmental Services Department, City of San Jose	95
EMMA MOORHEAD, California Public Interest Research Group	98
NEIL EDGAR, California Compost Coalition	100
DYLAN DE THOMAS, The Recycling Partnership	104
DARA FARNOUSH, Surfrider Foundation, CALPIRG	110
MATT SUTTON, California Restaurant Association	113
JENNIFER FEARING, Community Alliance with Family Farmers	115
SHIRA LANE, Atrium 916	117
CALEB WEISS, Environment California	120
ALEX TRUELOVE, Biodegradable Products Institute	121
FELIX BOLTON, California Public Interest Research Group	125
TEVIN HAMILTON, Physicians for Social Responsibility, Los Angeles	127
JUDY SORRE, 350 Bay Area Action	128
TY, California Public Interest Research Group	131
QUINN, California Public Interest Research Group	131

1 Sacramento, California, Tuesday, October 7, 2025

2 10:02 AM

3  
4  
5 MS. RICHMOND: Good morning, everyone. My  
6 name is Csilla Richmond. Thank you for joining us for  
7 today's public hearing on the SB 54 Plastic Pollution  
8 Prevention and Packaging Producer Responsibility Act  
9 permanent regulations. Before we begin, there are a  
10 couple of announcements that need to be made.

11 This hearing will be recorded. There is also  
12 a court reporter in attendance to transcribe the  
13 proceedings of this hearing. CalRecycle has Spanish  
14 interpretation of this hearing for those of you  
15 participating in person or remotely.

16 If you're in the room, we have Spanish  
17 interpretation headsets available. If you're  
18 participating on Zoom, just click on the interpretation  
19 icon at the bottom of your Zoom window and select the  
20 appropriate language.

21 Next, we have a required evacuation  
22 announcement. Please look around now and identify two  
23 exits closest to you. In some cases, an exit may be  
24 behind you. In the event of a fire alarm, we are  
25 required to evacuate this room. Please take your

1 valuables with you and do not use the elevators. All  
2 staff will endeavor to assist you to the nearest exit.

3 You should also know that you may find an exit  
4 door by following the ceiling-mounted exit signs.  
5 Evacuees will exit down the stairways and possibly to a  
6 relocation site across the street.

7 If you cannot use stairs, you will be directed  
8 to a protective vestibule inside a stairwell. Should we  
9 have to relocate out of the building, please obey all  
10 traffic signals and exercise caution crossing the  
11 street.

12 MR. CASTLETON: Good morning. My name is  
13 Craig Castleton. I'm the supervisor in CalRecycle's  
14 regulations unit. The purpose of today's hearing is to  
15 receive public comments on the proposed regulations that  
16 were published by the Office of Administrative Law and  
17 noticed to public on August 22nd, 2025.

18 The publishing of that notice started a 45-day  
19 public comment period. And CalRecycle welcomes and will  
20 respond to all comments received at today's hearing and  
21 during the 45-day public comment period in the final  
22 statement of reasons.

23 On today's agenda, we have an overview of the  
24 steps taken thus far and the current status of the  
25 rulemaking, followed by an opportunity to submit your

1 comments on the proposed regulations.

2 Present at the hearing today we have  
3 Marcus Santillano, environmental program manager with  
4 the project stewardship section. We also have  
5 Emma Cervantes, an attorney in the legal affairs office.  
6 And then we have additional staff from the product  
7 stewardship branch and legal affairs office joining us  
8 as well.

9 This is a brief overview of the steps taken  
10 thus far for this rulemaking. The slide shows that a  
11 public workshop was held on May 27th, 2025, to solicit  
12 feedback on proposed regulatory concepts and language.

13 Following this workshop, the concepts and  
14 regulatory language were developed into formal  
15 rulemaking documents that were published and noticed to  
16 the public on August 22nd, 2025, starting the 45-day  
17 public comment period. Today is the date of the public  
18 hearing, and CalRecycle welcomes your comments on the  
19 proposed regulations.

20 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 This final statements of reasons will be submitted to  
24 the Office of Administrative Law as part of the final  
25 official rulemaking file for these proposed regulations.

1           And then the Office of Administrative Law will  
2 review the rulemaking file. Once the Office of the  
3 Administrative Law approves the regulations, they will  
4 become effective.

5           MS. RICHMOND: CalRecycle welcomes comments  
6 from the public on the proposed SB 54 permanent  
7 regulations. As a reminder, the 45-day comment period  
8 ends at the conclusion of today's public hearing.

9           Now we would like to invite your comments on  
10 the proposed regulatory changes. To ensure that  
11 CalRecycle can receive everyone's comments during  
12 today's hearing, please follow these rules when making  
13 oral comments.

14           Please begin by giving your name and  
15 affiliation, if any. Please limit your comments to  
16 five minutes total. And if several people have spoken  
17 on the same topic, try not to be repetitious. If there  
18 are several speakers with the same comment, please  
19 appoint a spokesperson.

20           To make a comment in person, please line up at  
21 the podium. To make an oral comment via Zoom, please  
22 raise your hand and the host will unmute you.

23           Please submit written comments to the  
24 CalRecycle public comment portal by the end of the  
25 comment period, which is today, October 7th, 2025.

1 Comments will be taken first in person and second via  
2 Zoom audio.

3 Looks like we have a hand raised in the Zoom  
4 room. I'm not seeing anybody lined up at the podium.  
5 So Sarah, I'm going to go ahead and ask you to unmute.

6 SARAH: Hi. Good morning.

7 Are you able to hear me?

8 MS. RICHMOND: Yes, we can hear you.

9 SARAH: Hi. Good morning. My name is Sarah,  
10 and I work with Olli Salumeria. We make salami. We are  
11 USDA-regulated.

12 And we would like to know what are steps we  
13 can take in order to gain an exemption? I'm aware that  
14 in the August 2025 proposed regulatory texts, there were  
15 provisions for facilities regulated by, you know, the  
16 Federal Meat Inspection Act, USDA. So just curious to  
17 hear what you guys have to say about that.

18 MR. CASTLETON: Thank you for your comment.  
19 I'll repeat that the purpose of today's hearing is to  
20 receive comments on the proposed regulations. And that  
21 that all comments will be responded to in the final  
22 statement of reasons that becomes part of the official  
23 rulemaking file.

24 SARAH: Thanks.

25 MR. CASTLETON: So I see that we have people

1 lined up in the room, and so we can go ahead and receive  
2 those comments in person. Please go ahead.

3 MS. SPIEKERMAN: Test? Perfect.

4 Thank you very much. My name is Roxanne  
5 Spiekerman, and I'm the director of plastics for  
6 Circular Action Alliance. I'm here speaking as proxy  
7 for Emily Coven, a California executive director.

8 I'd like to thank the Department for the  
9 opportunity to submit written comments that will be  
10 written -- submitted by later this evening on the  
11 regulations, as well as the opportunity to speak here  
12 today.

13 CAA is honored to have been selected in  
14 January 2024 as a Producer Responsibility Organization  
15 for the Plastic Pollution Prevention and Packaging  
16 Producer Responsibility Act.

17 As a nonprofit, producer-led organization, CAA  
18 is committed to helping producers comply with EPR laws,  
19 delivering harmonized, best-in-class compliance  
20 services, and to working with governments, businesses,  
21 and communities to reduce waste and recycle more.

22 Since being selected as a PRO under SB 54, CAA  
23 has been fortunate to have many opportunities to engage  
24 with interest-holders across the spectrum, including  
25 producers, trade associations, local governments,

1 haulers, processors and markets, and numerous  
2 nongovernmental and community-based organizations.

3 One overreaching theme has emerged from those  
4 conversations. There is alignment. A shared goal of  
5 making this law work. Where we regularly find  
6 differences, and sometimes vehement ones, is not the  
7 what but the how. Well, we certainly will hear today  
8 about many of those differences of opinion.

9 CAA would like to assure CalRecycle and all  
10 the interested parties present that regardless of where  
11 the regulations land, we are deeply committed to  
12 implementing SB 54 effectively and ensuring the  
13 program's success.

14 That said, success will become exponentially  
15 more difficult if the regulations are not finalized by  
16 the end of the year. So we encourage everyone here to  
17 work together to resolve our differences, giving  
18 producers jurisdiction and service providers the  
19 certainty and clarity we all need to launch this program  
20 on time for 2027.

21 The written comments that CAA is submitting  
22 today focus on necessary changes to implement the  
23 regulations as efficiently and effectively as possible.  
24 As we all know, the ambitious target set by SB 54 will  
25 require a great deal of time and effort, as well as

1 financial investment.

2 Our written comments highlight challenges with  
3 timing and sequencing that could hinder not only CAA's  
4 efforts, but also those of everyone working towards our  
5 shared goal of reducing plastic waste and building a  
6 more circular economy. We see several opportunities for  
7 SB 54 with all parties which ultimately will result in a  
8 program that is more cost-effective and more impactful.

9 Thank you, again, for the opportunity. CAA  
10 looks forward to working with the Department as well as  
11 everyone participating today both in person and  
12 virtually to ensure a successful implementation that  
13 will establish California as the world's leader in  
14 packaging extended producer responsibility.

15 Thanks again.

16 MR. CASTLETON: Thank you for your comment.

17 MS. GRILL: Good morning. I'm Teri Grill, and  
18 I'm representing the Coalition for Protein Packaging.

19 So on behalf of the coalition, I want to  
20 commend CalRecycle for its balanced and thoughtful  
21 approach in these draft regulations. By recognizing the  
22 unique challenges of protein packaging, you've shown a  
23 commitment to ensuring public health and food safety as  
24 nonnegotiable priorities.

25 We especially appreciate that CalRecycle has

1 prioritized food security. Protein is a foundational  
2 part of the California diet. And by aligning packaging  
3 rules with federal standards, you're helping to ensure  
4 that fresh protein remains available, affordable, and  
5 safe.

6 Your reliance on federal law and agencies like  
7 the USDA and FDA is a strength. It demonstrates  
8 humility and foresight in acknowledging the agencies'  
9 expertise limitations in these very specialized areas of  
10 packaging. In doing so, CalRecycle has created a  
11 stable, less litigious framework that consumers and  
12 producers alike can trust.

13 Looking ahead, we encourage CalRecycle and the  
14 PRO to recognize industry associations as eligible  
15 applicants for market-based exclusions and exemptions.  
16 This would simplify compliance, reduce redundancy, and  
17 ensure the policies are applied consistently across the  
18 protein sector.

19 Finally, we want to thank CalRecycle for its  
20 collaborative approach throughout the process. This  
21 willingness to work with stakeholders builds trust, and  
22 it sets a strong foundation for successful  
23 implementation of SB 54.

24 MR. CASTLETON: Thank you for your comment.  
25 Just remind those in the room, please try and speak

1 directly into the microphone. It's got a very specific  
2 setting on it. And so that way we can all hear the  
3 comments that you're giving. Thank you.

4 MR. PAPPAS: Good morning. Nick Pappas of  
5 Californians Against Waste.

6 We had submitted comments repeatedly. Maybe a  
7 dozen times at this point. We've testified at every  
8 single workshop. Probably every single advisory  
9 committee meeting. So at this point it feels kind of  
10 redundant to repeat the same points.

11 We do have a very detailed comment letter  
12 coming later today. I just want to highlight the  
13 three -- what I think of as the three biggest flaws in  
14 the current proposed regulations. And again, I feel  
15 like I'm a broken record. But I guess that's sort of  
16 part of the process.

17 Now, on the chemical recycling, I think you've  
18 stretched really far from the statutory limits on what  
19 is allowed here. You know, take the hazardous waste  
20 section specifically. That one seems to be the most  
21 egregious.

22 The statute says that you're supposed to not  
23 allow facilities that generate significant quantities of  
24 hazardous waste. And I don't think you have followed  
25 any one of the words in that statement, because it's

1 about generation. And I don't think you even looked at  
2 generation. You looked at disposal.

3 Significant quantities has been defined as  
4 being in compliance with a permit, which doesn't say  
5 anything about whether or not it's a significant amount.  
6 And quantity is quantity, not the quality of the  
7 hazardous waste.

8 And finally, the definition of hazardous  
9 waste. You all are relying on the federal definition,  
10 when it's pretty clear that California law is governed  
11 by a different definition of hazardous waste.

12 On the exclusions. The current exclusions,  
13 while the most recent draft does get a little bit  
14 better, it does still create really broad loopholes that  
15 will be abused without a doubt. You know, look at the  
16 -- well, first of all, I mean, the legislature laid out  
17 specific exclusions. And that should be the range of  
18 exclusions that are in the regulations.

19 The fact they go beyond that is inappropriate,  
20 period. And anything beyond that should be considered  
21 under the unique challenges exemption, which is  
22 intentionally not a permanent exclusion.

23 And then, you know, you look at some of the  
24 federal language. And I keep going back to the fact  
25 that it lists compliance with legislation, regulations,

1 or guidelines. Right?

2 And "guideline" is an ill-defined term that  
3 could mean a single email issued from the Trump  
4 administration saying that whole categories of packaging  
5 should be in plastic. A guideline doesn't have any kind  
6 of Administrative Procedure Act. Doesn't have any kind  
7 of regulatory process. It is not a defined legal term.

8 And again, after these regulations are  
9 adopted, the regulated community that wants to be exempt  
10 just has to ask FDA or USDA to put out a statement about  
11 how important it is for plastic to protect food safety,  
12 or whatever they're arguing for.

13 The last thing I want to highlight, which  
14 hasn't really gotten as much attention but I think is  
15 another major pitfall, is the fake reuse. I think the  
16 original regulations probably were a little bit too  
17 prescriptive when it came to reuse. But the current  
18 regulations really open the door for rebranding  
19 disposables as reusables and not changing the status  
20 quo. And that's not what the public wanted.

21 You know, we did repeated polling when we  
22 looked at the ballot measure a few years ago with  
23 overwhelming support from the public for really wanting  
24 to see systemic change from the current packaging to  
25 less packaging and to more recyclable and compostable

1 alternatives. And allowing people to more or less  
2 rebrand disposable packaging as reusable totally defies  
3 that entire purpose.

4 We have, again, like I said, a lot more  
5 comments. And I know you've heard all these comments  
6 before. I'm not sure if there's going to be any changes  
7 taken based on them, because so far they've clearly not  
8 been accepted. But appreciate your time anyway. Thank  
9 you.

10 MR. SANTILLANO: Yeah. Thanks, Nick.  
11 Appreciate your comments.

12 MS. HINES: Hello. I'm Fiona Hines. I'm with  
13 California Public Interest Research Group education  
14 fund, also known as CALPIRG education fund. We're a  
15 public interest advocacy group that works on a number of  
16 issues that mainly are trying to solve problems that  
17 affect Californians' health, safety, and well-being.

18 And when this bill first passed, we delivered  
19 thousands of petitions in support from Californians, and  
20 we had done so again. This latest draft regulation we  
21 delivered over 4,000 petitions asking for them to be  
22 tightened and strengthened.

23 Like I said, we've had thousands of  
24 conversations with Californians both at their door, on  
25 college campuses, and around community events. We've

1 heard time and time again is that Californians want real  
2 solutions to wasteful and polluting packaging. They  
3 understand that their decisions alone will not solve the  
4 issue. That we need systemic change from industry and  
5 government working together, which I understand this  
6 bill is trying to do -- this law is trying to do.

7 So ensuring that this law is implemented with  
8 strong regulations is the best way we can do this the  
9 quickest way possible. And so I agree with what my  
10 colleagues had said previously that there was a couple  
11 things we're specifically concerned about today.

12 One is the weakened protections against  
13 chemical recycling, also known as advanced recycling.  
14 The language of SB 54 was clear that recycling  
15 technologies that were prohibited, if they provide -- if  
16 they create more hazardous waste than mechanical  
17 recycling. And the new regulations make this  
18 prohibition more vague, and also moot without a permit.

19 And so this is not how we should be protecting  
20 our communities from harmful technologies. And we would  
21 say that plastics-to-fuel facilities aren't solving the  
22 problem.

23 They're not reducing the demand for virgin  
24 plastics, and there's also the concern that some of them  
25 are creating new harmful waste. And even those that in

1 theory might be able to convert plastic waste into new  
2 plastics do pose major threats that we think are of  
3 concern, including releasing carcinogenic chemicals into  
4 the air.

5           So we would urge you all at CalRecycle to  
6 strength the regulation so that only real and safe  
7 technologies are allowed in our state and not ones that  
8 we -- could be allowed with both those changes I made to  
9 this law.

10           And we think that failing to do so risks the  
11 health of Californians and threatens to undermine the  
12 key intent of this law, which is to greatly reduce the  
13 amount of plastic waste we're producing and discarding  
14 into our environment and protect our communities from  
15 the environmental and health impacts of plastic  
16 production disposal.

17           And like our colleagues before us said, we're  
18 also concerned that the new FDA USDA exclusions risk  
19 creating major unintended loopholes that would deal a  
20 massive blow to the intent of this law, which is to  
21 unnecessarily limit -- and also unnecessarily limit the  
22 amount of waste that this law could prevent.

23           We don't think that entire categories of food  
24 or agricultural or over-the-counter drugs should be  
25 excluded carte blanche. And producers seeking exclusion

1 should have to provide detailed verification subject to  
2 public notice and public comment. And any exclusions  
3 granted should be time-bound.

4 Without these changes, I personally really  
5 fear that the plastic waste this law was passed to  
6 prevent will continue to fill our landfills and litter  
7 our communities. And I don't want that to happen, as I  
8 think none of you want that to happen either.

9 And so I urge CalRecycle to heed the  
10 suggestions and strengthen these regulations so that  
11 California can truly be a leader in protecting our  
12 communities from toxic pollutants and waste. Thanks so  
13 much.

14 MR. CASTLETON: Appreciate your comment.

15 MR. HAMILTON: Hello. My name is Tevin from  
16 Physicians for Social Responsibility, Los Angeles. And  
17 I'm also here with EJCAP, Environmental Justice  
18 Communities Against Plastics.

19 First off, I kind of want to uplift the  
20 comments that Nick made earlier about the chemical  
21 recycling ramifications. As an environmental justice --  
22 we're a coalition of environmental justice communities  
23 that represent the California communities who are most  
24 impacted by the life cycle of plastic. Our coalition  
25 includes Just Transition Alliance, Pacoima Beautiful,

1 PSR-LA, Black Women for Wellness, and I'm missing -- I'm  
2 blanking on the last one. But -- oh, Valley Improvement  
3 Projects. Thank you.

4 So the chemical recycling ramifications impact  
5 our communities a lot more than the other ones do.  
6 We're the ones who pay the brunt of the front line of  
7 what the impact of the life cycle really does.

8 For example, the incinerators that used to be  
9 in Pacoima, the incinerator that used to be in Long  
10 Beach, the incinerator that used to be in Modesto, it  
11 really impacts our communities. And though those  
12 facilities have closed down thus far, they still have  
13 long-lasting impacts on our community.

14 We also want to express our deep concerns that  
15 we've been engaging in this process for several months.  
16 This is my first time making comments here in person,  
17 but I have said several things over the course of months  
18 in the public comments written as the coalition.

19 We have made comments on the SB 54 advisory  
20 board about how these regulations are written really  
21 could give us harm. Would cause us long-term harms over  
22 the entire duration of SB 54. And everything it's  
23 trying to do is in direct violation of the statute, and  
24 we do not agree with what's going on with the  
25 regulations.

1           So the section that I'm really most interested  
2 in is the responsible end market section. And we're  
3 really concerned about how the producers are basically  
4 able to regulate themselves.

5           And what I mean by that is about what is,  
6 like, substantial compliance between our permits and  
7 their laws. Allowing their producers to really  
8 determine for themselves what can be an acceptable form  
9 of recycling gives them free range to potentially put in  
10 harmful impacts that will impact our communities.

11           So the pyrolysis plant that was potentially  
12 going to happen from Resynergi is an example of some of  
13 the risks that could happen. Yes, that project has  
14 transitioned and shifted to somewhere else. But those  
15 are the type of projects and type of technologies we  
16 don't want to risk coming back into California,  
17 especially in our communities.

18           When these facilities are going to be  
19 pumping -- deciding for locations, they're going to put  
20 them in the communities that could fight back and have  
21 the least amount of resources to really put up a fight  
22 against those type of billion-dollar corporations.

23           So we really urge CalRecycle to really tighten  
24 up the regulations in an effort to really make sure that  
25 these chemical recycling technologies are banned

1 explicitly. Because if you don't, you're really putting  
2 the communities that are most impacted in harm more than  
3 they already have been historically.

4 It's kind of ironic that this law generates  
5 funds to, kind of, reduce the harms and impacts and  
6 mitigate some of the harms of plastic. But it's also  
7 still feeding into that system, so it's a never-ending  
8 loop. So there's no point in just, kind of, putting  
9 money into a system that you're also putting money into  
10 worsening going forward. So thank you for your time.

11 MR. CASTLETON: Thank you for your comment.

12 MR. MELKONIAN: Good morning. My name is  
13 Gregory Melkonian, and I'm an analyst with Serlin Haley.  
14 But I am here on behalf of our client, AMERIPEN.

15 AMERIPEN, or the American Institute for  
16 Packaging and the Environment, represents the entire  
17 packaging value chain from material producers to brand  
18 owners to recycling partners. AMERIPEN represents all  
19 material types as well, including paper, metal, glass,  
20 and plastic.

21 To begin, we want to express gratitude towards  
22 CalRecycle staff and Director Heller for the thoughtful  
23 work and many hours involved in this year's rulemaking.  
24 While we may not agree with some of the outcomes in the  
25 proposed rules, we know the Department listened to and

1 considered input from the public to try to craft better  
2 policy.

3 In particular, I'd like to call attention to  
4 several areas in the rules that have improved since last  
5 year. First, we are grateful for the clear direction  
6 for identifying covered materials, more details  
7 regarding the exemption request processes, and a better  
8 outline of producer hierarchies. These elements will  
9 make it easier for producers to participate in and  
10 comply with SB 54.

11 Next, we recommend CalRecycle -- sorry. We  
12 commend CalRecycle for removing many complicated  
13 provisions for reuse and refill. As mentioned before,  
14 there may be more work to be done in this area going  
15 forward. But it's important for there to be flexibility  
16 now in order to foster innovation and help provide scale  
17 in this fledgling sector.

18 Third, the rules that clarify eligible cost  
19 and reimbursement methods are well-crafted. They will  
20 help ensure the program expenses are appropriately  
21 contained and funded.

22 That being said, it wouldn't be a comment  
23 opportunity without pointing to some areas of  
24 disagreement. AMERIPEN would like to call attention to  
25 the following issues that remain and are likely to

1 hinder the goals and implementation of SB 54.

2 As one example, changes made to the proposed  
3 rules this year limit the department's obligation to  
4 update the covered material categories list when new  
5 information becomes known. It is critical that the list  
6 adapts with growing investment and efforts to boost  
7 recycling, especially in the early years of the program.  
8 AMERIPEN requests that CalRecycle recommit to making  
9 more responsive updates to the list.

10 Second, AMERIPEN reiterates that the design of  
11 the trending on-ramp connected to SB 343 is arbitrarily  
12 limited. As it stands, this is counterproductive  
13 because it will actually hinder efforts to make certain  
14 materials more recyclable.

15 And finally, this year's version of the rule  
16 text omitted the provision that would have allowed for  
17 adjustments to the source reduction baseline based on  
18 factors outside producers' control, such as population  
19 growth. We believe the Department has regulatory  
20 authority to implement such adjustments, and we ask it  
21 to reexamine this area to avoid unwarranted market  
22 impacts.

23 In closing, AMERIPEN appreciates CalRecycle's  
24 deliberate work developing these rules, but urges the  
25 Department to consider the remaining areas of concern as

1 the program rolls out. Our written comments speak to  
2 the full scope of issues, and we are always happy to  
3 discuss them further with the Department. Thank you.

4 MR. CASTLETON: Thank you for your comment.

5 MS. CUNLIFFE: Okay. Good morning, all.

6 My name is Dr. Zoe Cunliffe, and I am the  
7 environmental justice program manager at a nonprofit  
8 called Black Women for Wellness and a member of the  
9 California statewide EJCAP coalition. As Tevin named,  
10 that's the Environmental Justice Communities Against  
11 Plastic.

12 My comment will really be building on what  
13 some allies and colleagues have mentioned. But I really  
14 want to bring, like, the EJ perspective on why it is  
15 that, like, these particular limitations of the  
16 regulations are so important in my comment.

17 So, Black Women for Wellness, BWW for short,  
18 is a reproductive justice and human rights organization  
19 based in South LA where an EJ team works to build  
20 healthier communities by addressing issues caused and  
21 perpetuated by environmental racism.

22 One of our major campaign areas is tackling  
23 the life cycle of plastic, which has a significant  
24 negative impact on health. And especially reproductive  
25 health, given the high incidence of endocrine-disrupting

1 chemicals in plastics and processes related to plastic,  
2 something that Black families and Black women in  
3 particular are overexposed to.

4 BWW has been conducting robust community  
5 engagement on plastics and the SB 54 process,  
6 specifically over the past two or more years, including  
7 a firm banking effort that reached over 11,000 people  
8 and culminating in a community report that we released  
9 earlier this year.

10 I'm raising this because, really, this  
11 community engagement is what informs and is behind my  
12 public comment today and this response to the  
13 regulations. So I want to touch on three of the  
14 significant limitations with the draft regulations and  
15 why these things really need to be addressed in order to  
16 meet EJ needs.

17 So first, as already raised by others, I think  
18 a significant limitation with the regulations as they  
19 currently stand are the way that the exclusions to  
20 covered materials are currently described. Right? So  
21 the draft allows for these exemptions if producers claim  
22 that it is not reasonably possible to use packaging that  
23 also complies with USDA or FDA rules or regulations.

24 This language is far too subjective. And as  
25 has been mentioned, potentially allows producers to

1 exclude these large swathes of food packaging and other  
2 kinds of packaging from the regulations and dodge  
3 accountability this way.

4           This is worrying for all sorts of reasons.  
5 But especially because low-income BIPOC communities  
6 across California typically face a particularly high  
7 burden when it comes to highly-processed and overly  
8 packaged foods.

9           For example, one in four Black people across  
10 the country face food insecurity. And the foods most  
11 available to these folks are awash in single-use  
12 plastic. So these are the reasons that it's really  
13 important that all relevant plastic food packaging is  
14 subject to these regulations and that these kinds of  
15 exemptions aren't made possible.

16           So the second limitation I want to touch on  
17 then is something that Nick brought up. That this is  
18 the -- the standards currently proposed for reuse and  
19 refill are not sufficiently strict, because there is no  
20 quantifiable definition given of the kind of reusable,  
21 refillable language in the regulations. Without this  
22 kind of definition, the regulations leave open the  
23 possibility of producers bringing in false solutions and  
24 reuse systems that are not worthy of the name.

25           As the communities that EJCAP represents can

1 attest, when strict definitions and accountability  
2 measures are absent, producers and polluters can and  
3 will shirk their responsibilities. And this must be  
4 avoided, otherwise it's BIPOC and low-income communities  
5 that suffer the most.

6 It's really important for SB 54 to pave the  
7 way towards genuine reuse and refill infrastructure and  
8 systems. And for these systems to operate in all  
9 communities, especially EJ communities where the need  
10 for alternatives is most keenly felt and has been called  
11 for repeatedly.

12 Third and finally, and again, this has come up  
13 already. But a really big problem with the regulations  
14 as they currently stand is that they permit chemical  
15 recycling. Right? So-called advanced recycling,  
16 advanced manufacturing. Whatever it is, it's just some  
17 form of incineration by another name.

18 So the technologies involved in chemical  
19 recycling are toxic to air, water, and soil. And always  
20 end up polluting and damaging the health, particularly  
21 of communities of color. Right? So the pollutants  
22 released by chemical recycling and these processes are  
23 linked to all sorts of health harms including cancer,  
24 reproductive harms, respiratory illness, and so on.

25 The whole point of SB 54 is to reduce plastic

1 production and protect public health, especially the  
2 health of EJ communities. Right? This is why the  
3 Plastic Pollution Mitigation Fund is supposed to  
4 generate these funds that go specifically to mitigate  
5 harms to these communities.

6 We can't end up in a situation where these  
7 PPMF funds that are much needed, right, a much-needed  
8 aid to addressing long-standing environmental racism  
9 across California, they can't just end up being a  
10 Band-Aid to fix problems like chemical recycling that  
11 SB 54 itself ends up making worse.

12 So in general, thank you for your time today.  
13 And I just really want to urge CalRecycle in finalizing  
14 and implementing and moving forwards with the SB 54  
15 process to really center environmental justice  
16 communities and organizations. Because it's really  
17 these communities that are the most harmed by the toxic  
18 life cycle of plastic. Thanks.

19 MR. CASTLETON: Thank you for your comment.

20 MR. DES ROSIERS: Thank you for having me. My  
21 name is Renaud des Rosiers, and I'm the director of  
22 sustainability at Amy's Kitchen.

23 For those of you who might not know Amy's, I  
24 should mention that we're a beloved California company  
25 rooted in Petaluma and are one of the largest producers

1 of organic vegetarian prepared meals. We make over 200  
2 frozen entrees, burritos, pizzas and snacks, as well as  
3 canned soups and chilis.

4 We're family-owned, mission-driven, and  
5 committed to always striving towards more sustainable  
6 operations in a material way beyond the performative  
7 incrementalism that is so common in corporate  
8 sustainability platforms.

9 I'm not here to go deeply into any of the  
10 technical issues in the current draft, as there are many  
11 voices here for that purpose. Instead, I want to share  
12 a perspective about our sustainable packaging journey,  
13 our concerns about where this process appears to be  
14 headed, and to urge you to ensure this rulemaking  
15 preserves the original intent of the statute by leaving  
16 broad room for compostable packaging as a compliance  
17 pathway for brands like Amy's who are trying to  
18 substantively lead the transformation to a fossil  
19 plastic free sustainable packaging future rather than  
20 ineffectively tinkering on the margins of a deeply  
21 flawed, incumbent system while further entrenching the  
22 conventional plastics the law purports to be working to  
23 reduce.

24 I personally have been leading Amy's  
25 sustainable packaging R&D journey for close to ten years

1 and am proud to report that over that time, we've made  
2 significant strides and have become a driving force  
3 towards the creation of innovation, renewable,  
4 plant-based circular packaging.

5 Our intent has always been to develop a proof  
6 of concept for a truly sustainable frozen meal assembly  
7 that we share broadly with our peers to transform the  
8 industry rather than trying to gain a competitive  
9 advantage through a marketing claim.

10 Right now, our frozen food packaging is mostly  
11 fiber-based, but has a plastic lining for grease  
12 resistance and a film plastic overwrap to provide shelf  
13 life and ensure we're delivering food safely to  
14 consumers. This is essential to getting the product to  
15 market.

16 The long-term goal of our sustainable  
17 packaging work has been to replace both of those  
18 conventional fossil-plastic layers with plant-based  
19 alternatives. I'd say we're about 75 percent of the way  
20 through the journey.

21 But without policy support from our home  
22 state, we won't be able to get to the finish line. In  
23 fact, we've been in a holding pattern through the SB 54  
24 rulemaking process due to the threats we've seen to the  
25 compostable products compliance pathway in the

1 conversations to date.

2 I want to highlight a few key insights that I  
3 believe the committee has not yet given the attention  
4 they deserve and highlight what continuing to ignore  
5 these realities would mean for Amy's and other  
6 innovative companies working towards sustainable  
7 packaging if SB 54 doesn't broadly accept compostable  
8 packaging as intended in the original statute.

9 First, I want to say that functionality really  
10 does matter. The idea that unlined, fiber-only is a  
11 suitable compliance pathway for compostable products is  
12 laughable. Functional barrier properties and other  
13 packaging engineering requirements are a reality of our  
14 modern food system that cannot simply be wished away.

15 In reality, the lack of functional properties  
16 including grease, water, and oxygen barriers mean that  
17 unlined fiber is unsuitable for most categories of food  
18 packaging, including food service ware. Its use would  
19 lead to a catastrophic failure of packaging systems and  
20 result in an exponential increase in food waste or, as  
21 we've seen already requested today, require the creation  
22 of significant exemptions for fossil plastics to provide  
23 the needed functionality.

24 Even many existing categories offered in  
25 fiber-only options, like paper straws, are not viable,

1 as they are rejected by a vast majority of the public,  
2 including advocates on the plastic reduction issue, due  
3 to their lack of functionality.

4 And humility requires that this committee  
5 recognize the impossibility of telling the people of  
6 California they cannot have their morning coffee,  
7 occasional takeout dinner, frozen foods, granola bars,  
8 and chips. These packaging formats can be replaced, but  
9 not without the use of a functional alternative.

10 Failing to acknowledge this reality would result in a  
11 public revolt as people's lives are materially affected  
12 by a ban without a plan.

13 Next, I want to highlight that compostables  
14 provide the only viable alternative to film plastics.  
15 Many categories of flexible materials, including food  
16 trays, films, multi-material laminates, most food  
17 service ware, and other small-format packaging simply  
18 cannot be replaced by recyclable options either today or  
19 in the future. Innovative, renewable, plant-based,  
20 circular, compostable products provide the only  
21 functional alternative to these categories.

22 The recycling system is already deeply  
23 burdened and only marginally economically viable.  
24 Broad-based collection of film plastic, food service  
25 ware, and small-format items is a fallacy that will

1 never been effective in terms of function, environmental  
2 benefit, or economic viability.

3           And though recycling is often thought of  
4 uncritically as a virtue in all circumstances, the  
5 reality is that there's a vast difference between the  
6 environmental and economic value in recycling rigid  
7 formats and dry fibers versus the environmental and  
8 economic cost of collecting film plastics in the  
9 recycling system. Doing something that has no financial  
10 or social value only to build a negative value recycling  
11 bail that has no market is a fool's errand.

12           And though it goes against the mantra of  
13 recycling everything regardless of the financial and  
14 environmental cost of doing so, this committee should  
15 acknowledge that some materials, like thin films and wet  
16 food-associated food service ware, are actually best  
17 managed outside the recycling system. For these  
18 marginal materials, the desirable management outcome is  
19 containment to avoid leakage to the environment,  
20 dematerialization, and ideally, contribution to healthy  
21 soils when collected in compost.

22           Finally, I want to add that compostables have  
23 value even as collection comes online. The  
24 conversations around collection of compostables in this  
25 committee over the past two years represents a good

1 example of the perfect being the enemy of the good.

2 While it is true that the loudest composter  
3 voices from the California Compost Coalition do not  
4 currently want to accept compostable products, focusing  
5 only on the short-sighted -- excuse me -- focusing only  
6 on that short-sighted reality ignore several of the  
7 meaningful benefits of compostables.

8 First, many composters across the country have  
9 successfully accepted compostable products for years  
10 while producing high-quality compost and recognizing  
11 compostables' value in helping citizens collect and  
12 divert food scraps. Even when not collected in  
13 composting, compostables significantly reduce reliance  
14 on fossil fuels throughout their life cycle in a way  
15 that no other material class can come close to.

16 And finally, compostables offer a significant  
17 advantage to conventional fossil plastics even when  
18 mismanaged. While context and specifics vary greatly, a  
19 reasonable approximation is that compostables offer a  
20 one to two order of magnitude advantage to conventional  
21 plastics in terms of nonpersistent in the environment.

22 While not intended -- while not the intended  
23 pathway, we know systems do fail. And when that  
24 happens, a mismanaged compostable material is likely to  
25 persist on the order of one to ten years in the

1 environment for PHA and PLA, respectively, versus  
2 perhaps 100 years or more for conventional plastics like  
3 HDPE.

4           And I want to add one more thing. Removing  
5 the compostable compliance pathway will result in more  
6 plastic. In a deeply cynical possibility, rulemaking  
7 that disallows the use of functional compostable  
8 products would result in the so-called Plastic Pollution  
9 Reduction Act forcing Amy's into rigid, plastic,  
10 thermoformed meal trays for compliance reasons,  
11 increasing our plastic use approximately tenfold.

12           If this committee is serious about its  
13 commitment to the spirit of SB 54, it must avoid  
14 stifling innovation around the one form of packaging  
15 that has the potential to materially replace a broad set  
16 of categories which can otherwise only be delivered  
17 using conventional fossil plastics.

18           Beyond abandoning the spirit of the statute,  
19 which explicitly calls for all packaging sold in the  
20 state of California to be recyclable, compostable, or  
21 reusable, failing to create a significant role for  
22 compostable products would have the sinister effect of  
23 locking in the current failed system and doubling down  
24 on conventional plastics, contrary to the very intent of  
25 the law.

1 Thank you for your time.

2 MR. CASTLETON: Thank you for your comment.

3 And as we've had several attendees join us  
4 since we started, I'll just repeat.

5 If you would like to make a comment in person,  
6 please line up at the podium. And then if you want to  
7 make an oral comment via Zoom, please raise your hand  
8 and the host will unmute you.

9 Please also submit your written comments to  
10 the CalRecycle public comment portal by the end of the  
11 comment period, which is today, October 7th, 2025. And  
12 we will go ahead and start on this side and take our  
13 in-person comments. Thank you.

14 MS. FEARING: Thank you very much.

15 My name is Jennifer Fearing. I'm here today  
16 on behalf of Monterey Bay Aquarium, Oceana, and Ocean  
17 Conservancy.

18 And while we will be providing comprehensive  
19 comments throughout today and in writing, I just want to  
20 focus on one aspect of our concerns with the regulations  
21 as proposed. And I also want to just state up front how  
22 important it is to our organizations that 54 work to  
23 achieve its ambitious goals.

24 But the piece I'd like to focus on is the  
25 categorical exclusions section that is new to this

1 version of the proposed formal regs. That's section  
2 18980.2. We believe that to be unnecessary, unlawful,  
3 and undermining of SB 54's overall objectives. And it  
4 could threaten to tank the entire program for a number  
5 of reasons.

6           The first is its permanence. The fact that  
7 it's a categorical exclusion means it will be considered  
8 once and done, and that will thwart innovation. And  
9 also, like, that's not something SB 54 ever envisioned  
10 was to permanently eliminate any packaging or food ware  
11 item through -- from the program.

12           The determination -- the way the regs are  
13 written, the determination of exclusion is being made by  
14 the producer and then puts the onus on CalRecycle to  
15 evaluate or disapprove. There are at least eight  
16 problems with this.

17           First, the volume is likely to be very high,  
18 because this is not about covered material. This is  
19 about a specific component. There are many components.  
20 I don't know why producers won't be motivated, given the  
21 bar and the fact that they get to claim -- make -- claim  
22 their own determination of exclusion. Very concerned  
23 about the volume of applications to CalRecycle here  
24 being very high.

25           That begs the question of who will pay for

1 CalRecycle's evaluation of every one of these  
2 determinations? And our read is since they are out of  
3 the program by the entity's own determination, it seems  
4 unlikely that the PRO will pay for that evaluation. And  
5 that leaves it on taxpayers, which seems highly  
6 incongruent with the objectives of this law.

7 Thirdly, the timeline that's laid out in the  
8 regulations. Any entity that claims the exclusion  
9 probably has up to the better part of a year to being  
10 out of the program, even if on its face it's an item  
11 that does not -- that there is clearly a compliant  
12 material for that component.

13 Again, that will -- that has a reinforcing  
14 impact on the volume, because there is sort of a no  
15 downside to a producer deciding to make that  
16 determination and enter that process. Seems to be a  
17 very inefficient use of CalRecycle staff time to be  
18 reviewing what could be a voluminous amount of  
19 applications.

20 Fifth, the uncertainty. This seems this will  
21 create enough uncertainty to make the PRO plan very  
22 difficult, if not impossible, to develop accurately.

23 Sixth, the low bar included in the regulations  
24 of inclusion of federal guidelines. I mean, it seems  
25 obvious that it would be very easy for the Feds to

1 change guidelines, especially with producers lobbying  
2 them to do so. Which again, seems like a circular  
3 opportunity here to see a lot of components and  
4 packaging removed from this program permanently.

5 And lastly, and I raised this at the last  
6 SB 54 advisory board meeting, there is a stark  
7 incongruity here that CalRecycle sees the need to  
8 explicitly create this problematic exclusion process to  
9 address -- what's said is address 54's direction to  
10 avoid conflicts with federal law while waving a hand at  
11 the repeated calls to explicitly ensure that the regs  
12 and any infrastructure to implement the law don't  
13 negatively impact disadvantaged communities.

14 There's nothing explicit in the regs that do  
15 that. Meanwhile, we now have this explicit provision  
16 aimed at addressing a similar type of direction in the  
17 law at the request of producers.

18 So for these reasons, we would strongly urge  
19 CalRecycle to strike section 18980.2 entirely.

20 Thank you.

21 MR. CASTLETON: Thank you for your comment.

22 MS. RICHMOND: It looks like we do have a few  
23 hands in the Zoom room. They've been waiting for a  
24 little bit, so we might want to shift there.

25 MR. CASTLETON: We'll take our in-person

1 comment first, and then we'll switch to Zoom. Thank  
2 you.

3 MS. WOLFRUM: My name is Amy Wolfrum. I am  
4 Monterey Bay Aquarium's director of California policy.

5 The proposed regulations undermine the laws,  
6 source reduction, producer responsibility, and pollution  
7 prevention strategies by authorizing illegal categorical  
8 exclusions for over-the-counter drugs, food and  
9 agricultural packaging, and secondary packaging  
10 associated with the excluded and exempted products.

11 Today I want to specifically address the  
12 proposed regulations exclusion of packaging associated  
13 with over-the-counter drugs. The statutory language and  
14 legislative history of SB 54 are clear. Only drugs that  
15 require a prescription are categorically excluded from  
16 54's requirements.

17 CalRecycle understood this, and that's why the  
18 regulations that were previously proposed did not  
19 exclude them based on the plain language in the statute,  
20 the legislative history, the primary author's statements  
21 and clear intent, and previous versions of implementing  
22 regulations. Packaging for over-the-counter drugs are  
23 within the scope of the law. CalRecycle's attempt to  
24 now exclude over-the-counter drug packaging through  
25 regulation is contrary to the law.

1           We will be submitting comments later today  
2 with more detail to support our urging that the  
3 regulations be amended to restore the inclusion of  
4 over-the-counter medication. Thank you.

5           MR. CASTLETON: Thank you for your comment.

6           And I see we have seven hands raised in Zoom,  
7 so we'll go ahead and switch over to Zoom. And then we  
8 will come back to in-person comments.

9           MS. RICHMOND: Christine, I see you have your  
10 hand raised. I'm going to ask you to unmute.

11           MS. BATIKIAN: Good morning. My name is  
12 Christine Batikian. I'm speaking on behalf of the City  
13 of Los Angeles, LA Sanitation and Environment.

14           Thank you for the opportunity to comment on  
15 the proposed regulations for SB 54. The City of  
16 Los Angeles strongly supports SB 54's intent to shift  
17 the responsibility for managing packaging waste from  
18 local governments and ratepayers to the producers who  
19 create it.

20           As the lead environmental agency for  
21 California's largest and most diverse city, LASAN serves  
22 nearly 4 million residents, providing curbside  
23 collection for about 750,000 households. And through  
24 our recycLA commercial franchise program, servicing  
25 roughly 65,000 businesses and multifamily buildings.

1           We appreciate CalRecycle's effort in  
2 developing these draft regulations. And we'll submit a  
3 more detailed written comment later outlining out  
4 recommendations later today. But now I'd like to  
5 highlight several key points.

6           First, local jurisdictions must have a voice  
7 in alternative collection systems operating within our  
8 boundaries. Without our consultation and consent, these  
9 systems could duplicate services, confuse residents, and  
10 shift costs back to ratepayers contrary to the intent of  
11 SB 54.

12           Second, we urge CalRecycle to remove the  
13 categorical exclusion in section 18980.2(a)2. Packaging  
14 that may face federal compliance issues should go  
15 through the existing time-limited exemption process, not  
16 receive a permanent carve-out.

17           Third, the increased cost criteria for covered  
18 cost must be clarified. Jurisdictions that have already  
19 invested in SB 54 align systems should not be  
20 penalized simply because those costs are not new.

21           Fourth, we urge CalRecycle to require PROs to  
22 consult with local jurisdictions before cost-covering  
23 recycling service providers to prevent duplicate of  
24 payments and protect our ratepayers.

25           And finally, we ask that local jurisdictions

1 not be subjected to the same penalty structure as  
2 producers. SB 54 was designed to hold producers  
3 accountable, not to impose \$50,000 per day fines on  
4 public agencies acting in good faith.

5 Thank you, again, for your time and for  
6 CalRecycle's continued leadership in shaping the  
7 framework that upholds both the letter and spirit of  
8 SB 54. And we look forward to continued collaboration.

9 MR. CASTLETON: Thank you for your comment.

10 MS. RICHMOND: Emerson, I'm going to ask you  
11 to unmute.

12 MS. DAMIANO: Hello. My name is Emerson  
13 Damiano, and I am a zero waste associate at CALPIRG in  
14 Los Angeles.

15 I have always been passionate about reducing  
16 plastic pollution, because it is an incredibly  
17 disastrous problem that causes a multitude of health  
18 effects and environmental crises, as previously touched  
19 on.

20 Microplastics have been found in the deepest  
21 depths of the ocean where humans have little to no  
22 access, proving the extent of our impact on our  
23 surrounding environments. In fact, the equivalent of  
24 one dump truck of plastic goes into the ocean every  
25 45 seconds.

1 SB 54 was a groundbreaking legislation  
2 regarding plastic pollution regulation in the United  
3 States. However, this legislation is at risk of being  
4 weakened.

5 Current regulations do not at all protect  
6 against harmful chemical recycling, as my colleague  
7 touched on, which is quite literally just a new term for  
8 incineration. Chemical recycling creates toxic  
9 pollutants that harm our environment and threaten public  
10 health and does not reduce demand for new plastic to be  
11 created.

12 Additionally, these regulations unlawfully  
13 exclude new, broad categories of products such as food  
14 and agricultural products or over-the-counter drugs,  
15 which leaves more plastic to pollute the environment.

16 Therefore, CalRecycle should strengthen these  
17 regulations so that only real recycling technologies are  
18 allowed in our state, not chemical recycling.  
19 CalRecycle should also not allow for broad exclusions of  
20 packaging for the aforementioned products, but instead  
21 institute an exemption process.

22 Thank you so much.

23 MR. CASTLETON: Thank you for your comment.

24 MS. KUSTIC: Good morning. I'm Allison Kustic  
25 with the Association of Plastic Recyclers. I'd like to

1 raise two main points that we think need to be addressed  
2 in the regulations.

3 First is that the regulations should build a  
4 system that supports North American recycling  
5 infrastructure. SB 54 is meant to build a transparent  
6 and robust recycling system for California, and this  
7 must include investing in recycling infrastructure in  
8 California and throughout North America rather than that  
9 outside of North America.

10 SB 54 is about collecting recyclable  
11 materials. But if there are no markets to sell that  
12 recycled plastic back into, the system will break down  
13 and California won't have a circular economy.

14 California plastic reclaimers are really  
15 struggling to stay in business as companies buy recycled  
16 plastic from overseas instead of buying locally. We've  
17 seen this really close at home. Just last month, we saw  
18 the closure of rPlanet Earth, the Southern California  
19 PET reclaimer, in part because they couldn't compete  
20 with the extremely low price of imports.

21 This is a huge loss in recycling capacity  
22 within the state and for all of North America. We think  
23 that we really can't wait to address this issue. And to  
24 that end, we've provided details in written comments for  
25 how the regulation language can be changed to better

1 support North American recyclers.

2           Specifically we'd like to see that the source  
3 reduction credit for the use of recycled content be  
4 granted only for the use of recycled content produced  
5 from North American sources and processed here as well.  
6 And we'd like to see investments made only to domestic  
7 or North American recyclers.

8           The second issue I'd like to raise is the  
9 definitions of plastic components. We ask that not all  
10 plastic components be treated the same when it comes to  
11 recycling. The definition should differentiate between  
12 components that are and are not recycled with the  
13 container.

14           We really want to build a system where it's  
15 easy to recycle the entire container as one unit and  
16 people don't have to take off caps, sprayers, labels,  
17 and all of those kinds of things. And so the component  
18 definition should reflect that the package is where this  
19 is the case. Where it can go and be recycled with the  
20 base product.

21           So we need to make sure that products are  
22 designed to be recycled. And to do that, there should  
23 be differentiation in the definition of how components  
24 are put into covered material categories. Thank you.

25           MR. CASTLETON: Thank you for your comment.

1 MS. RICHMOND: Krista, I will ask you to  
2 unmute.

3 MS. DURLAS: Good morning, and thank you for  
4 the opportunity to comment. My name is Krista Durlas,  
5 and I represent Bunzl Distribution.

6 Bunzl is a large distributor of essential  
7 business supplies. We sit in the middle of the supply  
8 chain between manufacturers and the businesses that use  
9 their products. While we don't control either side, we  
10 are well-positioned to influence both. And we help our  
11 customers improve packaging and food service ware with  
12 minimal disruption to their operations and costs.

13 We are going to follow up with more detailed  
14 comments today later, but we want to focus in on  
15 section 18980.1.1, which is the in-the-state aspect of  
16 producer determination.

17 We recognize CalRecycle for your leadership in  
18 advancing packaging sustainability and your continued  
19 engagement with the stakeholders throughout the  
20 rulemaking process. We also value the implementation  
21 guidance that CalRecycle has provided to date to help  
22 businesses account for materials and their components.

23 That said, with the reporting deadline  
24 approaching quickly, we are still unclear about which  
25 specific materials and components fall under our

1 reporting obligation. We work with over 1,000  
2 suppliers, and one challenge that we find -- that we  
3 face is that businesses generally don't share complete  
4 location information with one another, even when they're  
5 in long-term business relationships. That makes it  
6 difficult to impossible to determine which upstream  
7 suppliers are in the state for EPR purposes.

8           The proposed regulations don't resolve this  
9 issue for businesses with complex or global supply  
10 chains. It's nearly impossible to determine the  
11 jurisdictional status of our upstream suppliers. And  
12 without that clarity, we can't confidently determine our  
13 own reporting obligations.

14           In page 4 of CalRecycle's discussion document  
15 back from May 27th in the informal rulemaking workshop,  
16 CalRecycle said that they were going to -- they  
17 acknowledged the complexity. And they said that they  
18 were going to provide interpretive guidance and advice  
19 on how to resolve this. And it's -- you know, the  
20 deadline is here, and we still don't have clarification.

21           So given these challenges, we respectively  
22 urge CalRecycle to revise the in-state test to make it  
23 operationably feasible for businesses, whether or not  
24 the rule is revised. We also encourage the Agency to  
25 provide practical tools, clear examples, and

1 decision-making guidance to help regulated entities  
2 interpret and comply with requirements.

3           Specifically, we recommend -- you know, there  
4 could be a list. There could be a list of who is in the  
5 state. That would be helpful. And otherwise, you know,  
6 just any interpretive guidance with clear examples,  
7 decision trees.

8           Or in lieu of that, please provide safe harbor  
9 provisions for getting through the period where the  
10 uncertainty persists, and to consider enforcement  
11 leniency or a compliance grace period until this is  
12 resolved.

13           And with that, we just thank you for the  
14 opportunity to comment. And like I said, we'll follow  
15 up with more comments in writing later.

16           MR. CASTLETON: Thank you for your comments.  
17 And we will take three more Zoom comments, and then we  
18 will switch back to in the room. Thank you.

19           MS. RICHMOND: Renee, I'm going to ask you to  
20 unmute, please.

21           MS. SHARP: Hi. I'm Renee Sharp, a senior  
22 scientist with the Natural Resources Defense Council.

23           I already see we'll be submitting detailed  
24 comments later today that cover many issues that we see  
25 with the prepared regulations, including the fact that

1 the definition of categorically-excluded materials is  
2 overly broad and narrows state law impermissibly.

3 The definition of disposal and permissibly  
4 narrows the application of key definitions in the  
5 statute. CalRecycle must provide additional guidance on  
6 how the PRO is to implement the few provisions of SB 54  
7 that relate to toxic chemicals to give meaning to the  
8 statute's requirements. And recycled content and  
9 recycling rate accounting requirements should be made  
10 clear and prevent greenwashing.

11 Given our limited time here, I want to  
12 underscore one specific issue. Which is that the  
13 proposed language addressing chemical recycling is  
14 inconsistent with the law and undermines the statute's  
15 legislative intent.

16 There are many issues with the proposed  
17 language as it relates to chemical recycling, including  
18 defining significant amounts of hazardous waste based on  
19 the concept of risk and waste management conflicts with  
20 the intent and statutory language of SB 54. The  
21 exemption for compliance with permits further  
22 exacerbates these conflicts with the law.

23 Using the federal definition of hazardous  
24 waste rather than the California definition does not  
25 comport with the law. The definition of recycling for

1 technology as other than mechanical recycling relies  
2 inappropriately on a nonbinding ISO standard.  
3 Infrequent reporting of facility-level information could  
4 allow skirting of thresholds for significant amounts of  
5 hazardous waste.

6 And CalRecycle should include a definition of  
7 recycling in the regulations that categorically exclude  
8 specified chemical recycling technologies and reflect  
9 SB 54 language and legislative history.

10 So we'll provide, of course, much more detail  
11 in our comments that we'll be submitting very shortly.  
12 So just wanted to say thank you for your careful  
13 consideration of our comments, and we hope to see  
14 changes in the proposed regulations as they become  
15 finalized. Thank you.

16 MR. CASTLETON: Thank you for your comment.

17 MS. RICHMOND: I'm going to ask you to please  
18 unmute yourself.

19 MS. LIGARE: Good morning. My name is  
20 Miho Ligare. I am Surfrider Foundation's senior manager  
21 for plastic pollution initiative.

22 I'm also the ocean advocacy representative on  
23 the advisory board, and I'm honored to be serving in  
24 this capacity. And just to be clear, these comments on  
25 behalf of the Surfrider Foundation do not reflect the

1 views of the advisory board.

2 First off, a huge thank you to CalRecycle  
3 staff for your commitment and hard work in developing  
4 the regulations. We'll also be submitting a more  
5 detailed letter, but our main comments for today are  
6 dealing with articles 2 and 4, refill and reuse systems,  
7 mitigation funds, and implementation and enforcement of  
8 the State-led expanded polystyrene food ware  
9 prohibition. Many of my comments are comments made  
10 already by the Environmental Justice Communities Against  
11 Plastics, Californians Against Waste, CALPIRG, and  
12 others.

13 Starting with article 2, we are also concerned  
14 about the potential loophole through the exclusions. As  
15 it's currently written, it is too broad and will make  
16 this law ineffective.

17 With such a wide swath of categorically  
18 excluded materials, it seems like the PRO is set up to  
19 fail as it will be underfunded and there will be an  
20 unfair burden on those participating in the PRO. This  
21 also means that it will be harder to meet source  
22 reduction targets, as there are fewer producers.

23 And finally, it will also have a ripple effect  
24 on refill and reuse and creating an equitable system, as  
25 there will be fewer incentives and funding from the PRO

1 to transition from disposable packaging to refill.

2 In regarding article 4, I am deeply concerned  
3 about chemical recycling and want to reinforce the  
4 current regulation as clearly and critically at odds  
5 with the SB 54 statute.

6 The focus of management of waste through  
7 permits and the production of significant quantity of  
8 hazardous waste as to the generation of waste, which is  
9 in statute, is a significant shift away and opens the  
10 door for chemical recycling and is very problematic.  
11 SB 54 language refers to the amount of hazardous waste,  
12 not the risk associated with it. And these are clearly  
13 different standards.

14 So we'd like to see the alignment with the  
15 statute and regulations in the form of a categorical  
16 prohibition of chemical recycling technologies as  
17 envisioned in SB 54's requirement that California, or  
18 CalRecycle, excludes plastic recycling technologies that  
19 produce significant amounts of hazardous waste.

20 And if the State is seeking to reduce cost in  
21 this program, chemical recycling is not the answer. The  
22 estimated minimum sales price for chemical recycling is  
23 70 to 80 times as expensive as mechanical recycling.

24 And moving on to refill and reuse. We also  
25 heard from over 50 California-based ocean-friendly

1 restaurants who are also part of a national Surfrider  
2 program of over 600 ocean-friendly restaurants that  
3 without adequate standards for reusable and refillable  
4 packaging, it will make it harder for businesses to  
5 implement reuse and refill systems in an affordable and  
6 effective manner. Broad exclusions for more types of  
7 products will stifle innovation and cause confusion for  
8 business owners without lowering the price of  
9 sustainable alternatives.

10 And regarding concerns about the mitigation  
11 funds, there's concerns around the process and how to  
12 ensure that the funding will go to the communities most  
13 burdened by plastic pollution.

14 Although the mitigation funds will be  
15 allocated through the legislative budget process and  
16 aren't addressed in these regulations, I think it's  
17 still critical to ensure that environmental justice and  
18 travel representation is adequately made throughout the  
19 SB 54 implementation process. And there's clear  
20 processes established and understanding of how the  
21 mitigation funds will be allocated.

22 So we encourage CalRecycle to hold public  
23 workshops throughout the state on this topic and  
24 dedicate a web page to helping the public and  
25 communities understand the mitigation fund, timeline,

1 and process to access funding.

2 And then, finally, we appreciate CalRecycle's  
3 work to create a web page along with FAQs and sending  
4 out notices with additional information regarding  
5 expanded polystyrene food ware to producers. However,  
6 we'd like to see CalRecycle provide more enforcement  
7 beyond education and assistance.

8 We'd also like to see more transparency  
9 regarding how and who CalRecycle is reaching out to in  
10 providing compliance for support. For example, what's  
11 happening with the CalRecycle's online notification  
12 portal? We'd like to see a little bit more information  
13 about that.

14 And then finally, producers who were unable to  
15 demonstrate to the Department that the polystyrene  
16 recycling rate was unable to be met on January 1st,  
17 2025, should not have the opportunity to come back in  
18 the future attempting to show that they met the target  
19 recycling rate, even though the target is shifting.

20 There is concern that this will increase focus  
21 on the false recycling or advanced recycling of expanded  
22 polystyrene at the cost of our communities and the  
23 environment.

24 And so thank you so much for your time, and I  
25 look forward to the continued engagement.

1 MR. CASTLETON: Thank you for your comment.

2 MS. RICHMOND: It looks like we have one more  
3 hand raised. Cliff, please unmute yourself.

4 MR. FELDMAN: Good morning. Cliff Feldman,  
5 executive director of the West Contra Costa Integrated  
6 Waste Management Authority, AKA, RecycleMore. And I  
7 just have a couple of questions, but a few comments  
8 regarding the current regulations leading up to those  
9 questions.

10 It is clear that in chapter 3, article 1, the  
11 fundamental role of local jurisdictions, also construed  
12 as ratepayers, is crystal clear and being the backbone  
13 behind this entire system. It is also clear that the  
14 intent is to shift the cost burden of implementing the  
15 regulations from the producers away from the local  
16 jurisdictions, which would normally take place.

17 So questions that I have are pertaining to  
18 what controls are in place to ensure those fundamental  
19 premises are kept intact? That the producers are held  
20 accountable for the costs, and not the local  
21 jurisdictions?

22 Well, we applaud the advanced notice to local  
23 jurisdictions by the PRO before funds are distributed.  
24 And we certainly applaud transparency. Neither advanced  
25 notice nor transparency will be adequate. In fact,

1 those are abundantly inadequate to ensure that the  
2 integrity of the making the fundamental intent of the  
3 law is maintained. And that fundamental intent includes  
4 keeping local jurisdictions financially whole.

5 Where this regulation falls woefully short is  
6 that it does not prescribe that it will be illegal by  
7 service providers and recipients of PRO funds to also  
8 seek reimbursement from local jurisdictions for those  
9 costs. In addition, if any operational savings or  
10 process improvements are accrued via the funds paid by  
11 the PRO, how will the local jurisdictions be kept whole  
12 for those expenses as well?

13 So in essence, the questions are pretty  
14 simple. Where in these current regulations is it  
15 expressly illegal that service providers or recipients  
16 of the PRO cannot also seek reimbursement of costs paid  
17 by the PRO from the local jurisdictions?

18 And secondarily, where in these current  
19 regulations is it expressly illegal that the recipients  
20 of the PRO funds cannot benefit further and not pass  
21 along those savings via reduction of cost of operations  
22 or increased commodity revenue or a host of other  
23 process improvements in order to ensure the fundamental  
24 intent of the law in keeping the ratepayers financially  
25 whole is maintained?

1           Those are my simple questions, and I look  
2 forward to the Agency's responses. Thank you very much.

3           MR. CASTLETON: Thank you for your comment.  
4 We will now switch back to in-person comments, and we  
5 will start on this side of the room. Thank you.

6           MS. RACHED: Thank you. Hello. Sirine Rached  
7 here, speaking for the Global Alliance for Incinerator  
8 Alternatives. We're a global network of over 1,000  
9 grassroots groups in over 90 countries working for a  
10 shift towards a just zero-waste world.

11           Thank you for this opportunity. We've been  
12 engaging in this process, and apologies for any  
13 repetition in our comments. But unfortunately, our main  
14 concerns with the regulations have not been heard so  
15 far.

16           I will make some -- I will highlight some  
17 points that we are making in further detail in our  
18 written comments which we will be submitting in a few  
19 hours. And before I begin, I just want to echo concerns  
20 raised by colleagues of the environmental justice  
21 communities against plastics like Californians Against  
22 Waste, by the NRDC, and the Surfrider Foundation among  
23 others.

24           So the first point I want to make, we've heard  
25 that chemical recycling is incineration by another name.

1 I would go further and say pyrolysis is actually  
2 incineration under the Clean Air Act, and it fits with  
3 California's definition of incineration.

4 And pyrolysis being the main chemical  
5 recycling technology currently deployed, that means that  
6 so-called chemical recycling, in between quotation  
7 marks, is actually not recycling at all. It is  
8 disposal, and it should not be a technology that sees  
9 any growth as a result of these regulations.

10 The second point I'm going to make is that a  
11 prohibition or a moratorium on plastic waste pyrolysis,  
12 gasification, solvolysis, depolymerization, and  
13 solvent-based purification -- these are a family of  
14 technologies that are commonly marketed as so-called  
15 chemical recycling -- would best uphold the statute, and  
16 I'll explain why.

17 The third point I'll be making is that these  
18 technologies actually have unacceptable climate and  
19 toxic impacts, which are inconsistent with the statutory  
20 definition of a responsible end market. So another  
21 reason not to authorize them.

22 And finally, I will make the point that the  
23 regulations responsible end market criteria ignore the  
24 statutory emphasis not only on preventing harm, but on  
25 environmental benefits. And on preventing the

1 generation of hazardous waste, not simply managing  
2 whatever hazardous waste has been generated in  
3 compliance with permits. Furthermore, it fails  
4 environmental justice by failing to give any protections  
5 against cumulative impacts.

6 So coming back to the point that pyrolysis is  
7 incineration in federal law and in California law. This  
8 clarity in the law comes in contrast with the claims  
9 that we are hearing from sections of the industry that  
10 present these technologies as recycling.

11 Terms you may have heard include "advanced  
12 recycling" or "chemical recycling." And as you may be  
13 aware, California's attorney general has filed a lawsuit  
14 alleging, with ample evidence, that these technologies  
15 are not recycling at all. And they are described by the  
16 attorney general as deceptive business practices.

17 And this is why these regulations, in our  
18 view, are absolutely essential in providing the clarity  
19 and reinforcing the law and in providing clarity in the  
20 face of these claims that threaten genuine mechanical  
21 recycling with technologies that actually don't result  
22 in a significant amount of plastic waste coming back  
23 into new products.

24 So pyrolysis and associated processes actually  
25 burn off most of the plastic waste. They also produce a

1 low-yield and highly contaminated oil, pyrolysis oil,  
2 that needs dilution with large amounts of virgin  
3 petroleum naphtha to become usable. Okay?

4 This means that in the best case scenario,  
5 only 2 percent of the plastic waste that we are feeding  
6 into this pyrolysis process, so-called chemical  
7 recycling, will make the round trip into a steam cracker  
8 and effectively be recycled.

9 So really, we really insist on the importance  
10 of having a prohibition, or at least a moratorium, on  
11 this family of technologies, pyrolysis, gasification,  
12 solvolysis and the others in order to uphold the  
13 statute.

14 Furthermore, let me jump to the -- now some  
15 evidence on these costs. Why am I saying that the  
16 climate and toxic costs are not compatible with the  
17 statute?

18 The statute does say -- again, it doesn't only  
19 say minimize the harm. It says we need -- responsible  
20 end market means a material market that is conducted in  
21 a way that benefits the environment and minimizes risk  
22 to public health and worker health and safety. However,  
23 this evidence that we are presenting in detail in our  
24 letter negates that.

25 So, first of all, life cycle assessments when

1 probably conducted actually show that chemical recycling  
2 has a significant toxic footprint from the use of  
3 solvents. And this toxic footprint, which is often not  
4 considered in the literature, is actually also  
5 responsible for a large amount of the carbon footprint  
6 from these technologies.

7           The hazardous waste issue that relates to  
8 chemical recycling is not only at the facility itself,  
9 but across all the lines, transportation lines, where  
10 this waste must be transported until final disposal at a  
11 hazardous waste facility, as our colleagues at the NRDC  
12 have shown in a very good investigation.

13           And as some of you may recall who like to read  
14 ProPublica, this investigative outlet showed that the  
15 EPA estimated a 100 percent cancer risk from lifetime  
16 exposure to pollution from a boat-fuel component that is  
17 made through the pyrolysis of plastic waste. They also  
18 showed at a separate facility that the EPA estimated a  
19 one-in-four cancer risk for people exposed to pollution  
20 from this facility over a lifetime.

21           And, of course, that is relevant because  
22 lifetime exposure is what happens when you live next to  
23 a facility. It is constant, daily exposure that  
24 accumulates to this unacceptable cancer risk. We don't  
25 see how this is consistent with statute at all.

1           On the greenhouse gas, as I mentioned earlier,  
2 part of this footprint is due to the solvent use.  
3 Chemical recycling is a major emitter of carbon, and has  
4 been found to produce carbon emissions an order of  
5 magnitude more than mechanical recycling, and more  
6 emissions per ton than primary plastic.

7           So chemical recycling of plastic produces more  
8 carbon per ton than making new virgin plastic. Again,  
9 we don't see how embracing chemical recycling in the  
10 regulation makes any sense, given California's climate  
11 commitments.

12           Finally, I'll just conclude here to say that  
13 we really are concerned that the regulation does not  
14 provide any protection for environmental justice,  
15 despite the requirements and statute.

16           And specifically, it brings no safeguards  
17 against cumulative impacts when several end markets or  
18 several recycling facilities might be located in the  
19 same community. And the only mention is significant  
20 compliance or rough compliance with the permit. This  
21 doesn't address the harm from the accumulation of  
22 polluting facilities in one location.

23           And finally, one point that is really dear to  
24 GAIA's heart given our work on environmental justice on  
25 a global scale, California exports a lot of its plastic

1 waste beyond its borders, including to Mexico and Asia.  
2 And the language in the regulation provides no -- no  
3 protection for countries where environmental regulations  
4 are insufficient. And compliance with permit does not  
5 constitute a safeguard for human health and the  
6 environment.

7 So thank you for your patience, and we will be  
8 providing further detail in our written comments.

9 MR. CASTLETON: Thank you for your comment.

10 MS. BRANDON: Hi, there. Dr. Anja Brandon,  
11 director of plastics policy at Ocean Conservancy.

12 I'm going to focus my comments today on  
13 article 4.1 on nonmechanical recycling technologies. As  
14 you've heard from us previously and other groups today,  
15 these regulations go beyond what is authorized in the  
16 statute by allowing technologies that generate a  
17 significant amount of hazardous waste to count as  
18 recycling.

19 And by failing to encourage recycling  
20 technologies that minimize the generation of hazardous  
21 waste, the generation of greenhouse gases, environmental  
22 impacts, environmental justice impacts, and public  
23 health impacts per the specific and detailed  
24 requirements outlined in section 42041(AA)5.

25 These regulations propose an unlawful shift

1 from a criteria based on production to the disposition  
2 and management of hazardous waste. Moreover, this  
3 criteria is rendered essentially moot by allowing for  
4 hazardous waste managed under a permit to not count.

5           These proposed regulations continue to fail to  
6 encourage recycling technology that minimize impacts to  
7 people and the planet. And the ISO standard cited does  
8 not speak to these issues.

9           It's worth noting that the permitting  
10 requirements are -- that permitting requirements are not  
11 uniform across the country, let alone the world. Which  
12 is why the drafters of SB 54 intentionally drafted  
13 language to develop criteria based on production which  
14 would create a more level playing field.

15           As written, these proposed regulations, in  
16 effect, give preferential treatment to areas with the  
17 least stringent permitting requirements, which directly  
18 goes against the Department's statutory requirement in  
19 section 42060(d) to ensure that the regulations avoid or  
20 minimize disproportionate impacts to disadvantaged or  
21 low-income communities or rural areas, which too often  
22 are communities that live in or around areas with weak  
23 permitting requirements.

24           Rather than encouraging innovation and system  
25 change, these proposed regulations seem to be aimed at

1 maintaining the status quo. We encourage CalRecycle to  
2 outline a clear and uniform criteria based on the  
3 production of hazardous waste, the actual amount of  
4 hazardous waste generated, as called for in the law.

5 We have additional comments on this section,  
6 including concerns over the definition of hazardous  
7 waste used, as well as a lack of transparency and data  
8 on these facilities being shared with the Department and  
9 with the public. We will follow up with more details  
10 and encourage you to revisit this section. Thank you.

11 MR. CASTLETON: Thank you for your comment.

12 MS. SANBORN: Good morning. My name is  
13 Heidi Sanborn. I'm the director of the National  
14 Stewardship Action Council, and we advocate for a  
15 responsible circular economy.

16 And I am, along with others in this room  
17 including Dr. Brandon, were in -- worked very hard in  
18 negotiating SB 54 to be something we could all be proud  
19 of. And I want to reiterate -- there's so many comments  
20 that were made today that I don't want to restate.

21 So I'll just say the comments that she just  
22 made about the chemical recycling are very clear in the  
23 law that we're not following it in this version of the  
24 regs. The comments about the cost to local governments  
25 and the cost shift to the producers, we should not have

1 \$50,000 fines for local governments. They've carried  
2 the weight all these years, and it's time for the  
3 producers to have responsibility. And that's the way  
4 this law was written.

5           And I can just say that, you know, my biggest  
6 concern about this version of the regulations is that  
7 they really don't follow the law. And if there's one  
8 thing that this agency is responsible for, it's  
9 following the law. And the regs should align clearly  
10 with the statute.

11           It doesn't even include discussion about  
12 another PRO. That's in the law. They're not in there.  
13 How can another PRO compete with the existing PRO? To  
14 keep cost down and create competition, which is part of  
15 our mantra in this economy.

16           Exclusions, that is a whole nother level of  
17 not following the law. You know, we have a member of  
18 our working group on SB 54 named Gary Cohen. He's out  
19 of Tennessee and working on packaging there. He came  
20 out of the packaging industry and had 40 years of  
21 experience and has submitted a comment that he shared  
22 with me.

23           And that basically he's consulted with other  
24 food safety experts who are also 40-year experts in the  
25 field, and he has submitted their comments as well. But

1 I just want to reiterate and uplift one of his comments.

2 That based on his experience with FSMA, the  
3 Food Safety Modernization Act and the HACCP protocols, I  
4 believe the draft language could potentially exempt  
5 70 percent of food packaging found in a typical  
6 supermarket.

7 That was not the intent of the law, I can  
8 assure you, from the people who were negotiating it.  
9 And they're very concerned with how this is going to  
10 affect other states and their state, even in Tennessee,  
11 rolling out what they're hoping to pass.

12 And his request was that before finalizing  
13 article 2, please pause and consult with qualified food  
14 safety experts to ensure that the draft exemptions do  
15 not unintentionally undermine the very goals and  
16 financial stability of SB 54. This is like Groundhog  
17 Day. I, and many others, have made many of these  
18 comments multiple times before. But this is like  
19 driving a truck through the regulations.

20 It is going to result, in my prediction, of a  
21 lot of litigation on both sides. The businesses, when  
22 they get the bill for actually having to comply with  
23 this that are left paying, are going to revolt, in my  
24 opinion. Because why would they want to carry the  
25 weight for the 70 percent that are going to ask for an

1 exclusion, permanently exempted from having to do  
2 anything? That's just shameful, quite frankly. And I'm  
3 very disappointed that this is where we are.

4 While I appreciate the opportunity to comment  
5 again, stakeholders are quickly losing faith that  
6 thoughtfully-negotiated bills in California can be  
7 implemented as they were written. And I really hope  
8 this goes better in the next draft, because I am  
9 concerned about what that means for not only California,  
10 but for the nation. Thank you.

11 MR. CASTLETON: Thank you for your comment.

12 MS. SHARP: Good morning. My name is  
13 Layla Sharp. I work with Environment California as a  
14 clean air and water intern.

15 On behalf of Environment California, I urge  
16 CalRecycle to strengthen the regulations under SB 54 so  
17 that only real recycling technologies are allowed in our  
18 state.

19 This is our opportunity to make California a  
20 national leader in real solutions to plastic pollution  
21 by not allowing loopholes and false solutions to  
22 undermine the intent of SB 54. Allowing chemical  
23 recycling is worse than creating new plastic in many  
24 ways. It is similar to plastic incineration that  
25 releases toxic chemicals in our air and water.

1           These facilities are often built in low-income  
2 neighborhoods and communities of color, adding to the  
3 environmental injustices that these residents face every  
4 day. I grew up in southeastern parts of San Diego where  
5 pollution became normalized, and communities like mine  
6 were often overlooked when it came to environmental  
7 protections.

8           During heatwaves and wildfires, the air would  
9 hang low and thick with smoke. And by the age of 16, I  
10 would have migraines at least twice a week during  
11 wildfire season. My family accepted it as it was  
12 normal, and no one and no community should have to  
13 accept this in their home.

14           Far too long, families like mine have lived  
15 with the consequences of weak environmental policies.  
16 Policies like SB 54 are supposed to protect them from  
17 these kinds of harms, not make it worse.

18           I ask CalRecycle to keep SB 54 strong and to  
19 not improve anything that fails to represent the best  
20 intent of California residents. Ban chemical recycling  
21 and hold producers accountable to ensure the final  
22 regulations truly reduce plastic as a source and not  
23 shift the burden onto communities already breathing air  
24 pollution.

25           Now we have the chance to protect public

1 health, clean air, and environmental justice across  
2 California. Please do not let weak regulations take  
3 that away. Thank you for your time.

4 MR. CASTLETON: Thank you for your comment.

5 MS. GARCIA: My name is Karla Garibay Garcia.  
6 I'm with the Monterey Bay Aquarium.

7 I'd like to first echo the comments from  
8 others related to the environmental justice concerns  
9 with hazardous waste generation technologies. But my  
10 comments today are focused on SB 54's goal to reduce  
11 plastic production at the source.

12 Monterey Bay Aquarium and our colleagues at  
13 Oceana and Ocean Conservancy appreciate that the  
14 proposed regulations maintain the integrity of the  
15 source reduction mandate. The removal of the source  
16 reduction adjustment language from prior versions of the  
17 regulations is critical to effectuate the intent of the  
18 law.

19 The requirement to source-reduce  
20 plastic-covered material by no less than 25 percent by  
21 January 1st, 2032, was fundamental to our organization's  
22 support of SB 54. And it was carefully negotiated as  
23 part of withdrawing the ballot initiative.

24 Neither the Department nor the PRO have the  
25 statutory authority to adjust the amount of

1 plastic-covered material that is required to be reduced  
2 relative to the baseline.

3           So with this in mind, we urge CalRecycle to  
4 ensure that the final regulations do not include a  
5 source reduction adjustment factor, as any effort to  
6 change the source reduction mandate in the regulation  
7 would be unlawful and ultimately undermine the clear  
8 intent of SB 54. Thank you.

9           MR. CASTLETON: Thank you for your comment.

10           MR. HELM: Hello again. Tom Helm. I'm the  
11 cofounder of Valley Improvement Projects, an  
12 environmental justice organization. I'm also the  
13 environmental justice representative on the advisory  
14 board, but my comments here today are representing  
15 Valley Improvement Projects and other environmental  
16 justice organizations that I work with.

17           From an environment justice perspective, we  
18 know that the State of California actually recommended  
19 that if you want a site-polluting industry like trash  
20 incinerators, that you should look to low-income,  
21 low-education rural communities. That even the SOREL  
22 report mentions Catholic communities.

23           A couple years after that report was written,  
24 West Stanislaus County, which is about 80 percent Latino  
25 area, got one of the, at the time, three trash

1 incinerators in the state of California. At the time,  
2 the city of Modesto and Stanislaus County had one of the  
3 earliest volunteer weekly curbside recycling programs in  
4 the state.

5 But after you bring in a facility that makes  
6 its money off of burning trash, including plastics, that  
7 recycling program was slowly phased out. This is what  
8 happens when you commodify the use of waste to create  
9 energy or fuels, basically commodifying the waste. Then  
10 you have an incentive to produce more, and not less.  
11 And that is a large concern of what we see in these  
12 regulations.

13 SB 54 itself says that environmental justice  
14 communities, disadvantaged communities, communities of  
15 color in California are shouldering the burden of  
16 plastic pollution in the state and the health effects  
17 that come along with it.

18 So a weak set of regulations, or dragging on  
19 the regulatory process, only hurts those environmental  
20 justice communities, which is why this is -- I'm taking  
21 this last chance on this final day of the regulation  
22 comment period to, again, say many of the same comments  
23 I've made before, which I know we were asked to not be  
24 repetitive. But it's kind of the only thing I have at  
25 this point. Because all the other comments and from

1 other environmental justice groups have basically been  
2 ignored, if not made worse by the newer version of the  
3 regulations.

4 Another major problem that environmental  
5 justice has had with similar regulations as these is too  
6 much control over the industry itself being regulated,  
7 which we see with the PRO and the numerous  
8 responsibilities and powers that they have in these  
9 regulations and over this process.

10 We now see another issue, which is the turning  
11 over of some of these rules and definitions to the  
12 federal government. Giving exclusions to too broad of a  
13 range of products that, as mentioned earlier, under this  
14 current administration could simply be made an exclusion  
15 to this process with a memo from the FDA or the USDA.  
16 And I think we're all aware that the federal government  
17 right now is moving towards deregulating and lessening  
18 regulations, despite the cost to human health.

19 We also believe that the reusable and  
20 refillable language is too vague. That we could end up  
21 with sort of like with the plastic bag ban which gave us  
22 thicker, single-use plastic bags. I don't want to be  
23 drinking out of a slightly thicker plastic cup that is  
24 still being mass-produced, because it's able to count as  
25 reusable and refillable. And I think as we saw with the

1 plastic bag ban, the industries that are creating these  
2 products will gladly take advantage of vague language  
3 and regulations.

4           The responsibility end market section has, of  
5 course, been the biggest cause of concern, as I  
6 mentioned with the incinerator in our county taking away  
7 the incentive to reduce waste. I feel that that's where  
8 we could be headed if these regulations allow for  
9 chemical recycling, which use the plastic waste to  
10 create fuel. And that becomes a profit motive. And  
11 that becomes an industry that is going to be promoted,  
12 which I think is the exact opposite of what was meant  
13 with SB 54.

14           The original language in the regulations was  
15 better. It set up a rigorous process for comparing  
16 these technologies to mechanical recycling and making  
17 sure that they're not producing more pollution. And  
18 that language was taken out when we were told the  
19 language had to change to reduce cost on consumers.

20           Through conversations with CalRecycle staff,  
21 it was mentioned to me that the language that was  
22 changed was reflective on new data. And that that is  
23 what led to showing that the costs were actually lower  
24 on consumers. And if that's the case, I don't know why  
25 that section on chemical recycling technologies was

1 changed at all. That didn't have anything to do with,  
2 you know, changing baseline data. It seems purely an  
3 influence from industries that want to utilize this  
4 technology.

5           What also got worse was instead of taking into  
6 account whether or not significant hazardous waste was  
7 being created is now just if a facility is in  
8 substantial compliance with a permit creating hazardous  
9 waste, which is overseen by the Department of Toxic  
10 Substances Control for the most part which has numerous  
11 hazardous waste facilities in the state that have  
12 literally been operating for decades without a permit.  
13 And this is how we want to oversee these industries that  
14 are going to be producing more hazardous waste, most  
15 likely in environmental justice communities and  
16 communities of color, as what happened with  
17 incinerators.

18           Valley Improvement Projects is a founding  
19 member of the California Environmental Justice  
20 Coalition, which has been around for over ten years now,  
21 and has almost 90 groups in the coalition. And it was  
22 formed by literally dozens of environmental justice  
23 organizations that had major issues with the Department  
24 of Substances Control, mainly due to their cleanup and  
25 management and regulation of hazardous waste facilities.

1 So this is just opening up a whole new door to allow  
2 hazardous waste into environmental justice communities  
3 while we have this lax regulatory system on them.

4 For some reason, I'm not sure why, the State  
5 is relying on the federal definition of hazardous waste.  
6 I thought California came up with their own laws to be  
7 more protective than the federal government.

8 And in fact, we've been making the same exact  
9 argument to DTSC lately, who basically tried to switch  
10 that out and say, "Well, maybe the federal definition of  
11 hazardous waste isn't so bad. In fact, we want to allow  
12 some hazardous waste that wouldn't be allowed under  
13 California's law, but that is allowed under federal law  
14 to go into local municipal landfills."

15 That was part of their hazardous waste  
16 management plan was to let non-recurrent contaminated  
17 soils go to municipal landfills. Guess where those  
18 municipal landfills are for the most part? Just like  
19 incinerators, next to communities of color and  
20 environmental justice communities.

21 You also have this reliance on the ISO  
22 standard, which is very far away from addressing  
23 environmental justice impacts, hazardous waste impacts,  
24 greenhouse gases, and other environmental pollution and  
25 contamination.

1           Again, to sound like a broken record and bring  
2 it back to chemical recycling, there is too big of a  
3 loophole for an industry that was -- that was said by  
4 the author of SB 54, Senator Allen, that pyrolysis  
5 facilities, gasification, solvolysis, these other types  
6 of incinerators and chemical recycling, were never the  
7 intent to be allowed under SB 54 and to be on the same  
8 playing field with other types of recycling. But yet  
9 these regulations open up those loopholes to happen.

10           And we've said from the very beginning that it  
11 should just be banned, just like Senator Allen had said.  
12 That those types of technologies should not be allowed  
13 under this. We got the first set of regulations, like I  
14 said, were stronger. And we kept advocating for a ban.  
15 And after all of those public comments, the regulations  
16 just got weaker, and we feel opened that door even wider  
17 for these technologies to come in.

18           It was mentioned earlier before, and I've  
19 mentioned it many times before. You don't have to take  
20 my word for it or the environmental justice community.  
21 You can look at the law suits of our own attorney  
22 general in the state who is suing because of what he  
23 refers to as the new wave of a scam of making the public  
24 think that we can go ahead and keep producing these  
25 single-use plastic products and many other plastic

1 products because they will be recycled now chemically.

2 And so it lets the industry off the hook for  
3 having to reduce of production of plastics, and that's  
4 what we want to see in strong regulations. No chemical  
5 recycling, nontoxic reuse and refill, source reductions,  
6 a true polluter-pays program where we're not going to  
7 allow the producers to get out of paying for certain  
8 aspects that are outlined in SB 54.

9 And starting with environmental justice  
10 communities for these programs, for these cleanups, to  
11 undo the decades of harm that commodifying waste and  
12 allowing polluting technologies and hazardous waste in  
13 environmental justice communities. Thank you.

14 MR. CASTLETON: Thank you for your comment.

15 MS. KOEPKE: Okay. Good afternoon, or good  
16 morning, I guess, still.

17 Dawn Koepke with McHugh Koepke Padron  
18 providing comments on behalf of two clients, if I may.  
19 First, the California Manufacturers and Technology  
20 Association. Appreciate the opportunity to provide  
21 these comments on this updated proposed permanent  
22 regulation. A few things, all of which will be included  
23 as part of our robust comments to be submitted later  
24 today. And I'll just touch on a couple of high points.

25 With regard to section 18980.1(a)8. This is

1 related to the definition of food service ware. CMTA  
2 and its members continue to have concerns about the  
3 definition and the lack of clarity. That it suggests in  
4 terms of who is considered the producer for that food  
5 service as it relates to reference to good versus food  
6 packaging, food service, and specifically concerns about  
7 ambiguity when it comes to the manufacturer of that  
8 actual packaging versus who puts it into commerce by use  
9 and providing it to consumers. So continue to have  
10 concerns about that.

11 With regard to the definition of plastic in  
12 18980.1(a)15. CMTA also just notes and has concerns  
13 that certainly the regulatory definition of plastic is  
14 incredibly broad. And in that regard includes  
15 everything from your traditional plastics to even  
16 coatings and adhesives that provides potentially  
17 significant compliance challenges, particularly for  
18 fiber-based materials.

19 That broad scope could complicate producers'  
20 ability to accurately identify, separate, and report  
21 plastic content. And so a lot of concerns about that.  
22 CMTA has continued to recommend the use of the de  
23 minimis reference within the statute to set a threshold  
24 for considering that.

25 Sorry. It's, like, so low.

1 MR. SANTILLANO: I think folks online are  
2 hearing it in and out. So, yeah, I think we need to  
3 stand closer to the mic if possible.

4 MS. KOEPKE: Okay. Thank you. Sorry about  
5 that.

6 So in terms of the de minimis reference within  
7 the statute, CMTA continues to believe it would be  
8 important for added clarity and to avoid ambiguity to  
9 further clarify and refine what de minimis means in the  
10 context of the regulations for plastics as specifically  
11 recommending setting a threshold.

12 Further, in section 18980.2.2(b), defines  
13 criteria to meet that de minimis standard. However,  
14 this section requires added clarity on how it applies to  
15 adhesives and coatings on packaging that are primarily  
16 composed of recycled materials.

17 A couple of additional points regarding  
18 detachable components. We continue to have a bit of  
19 concern. And it seems as though, based on the  
20 detachable components, components within the regulation,  
21 that there could be a lack of alignment with the  
22 Association of Plastic Recyclers' design guides, which  
23 recommend leaving plastic caps on bottles and containers  
24 when recycling.

25 Further, kind of, similar situation, we note

1 that the department as well as the --

2 (Technical difficulties)

3 MS. KOEPKE: Sorry. Should I just continue?  
4 I feel like it's even cutting in and out on my end, too.

5 So we would note that the department as well  
6 as the beverage industry have been working on a campaign  
7 focused on keeping caps on when returning beverage  
8 containers for recycling. And we think that the  
9 detachable components language within the regs needs to  
10 align with that for the broader universe of packaging as  
11 well.

12 We strongly support the inclusion -- or,  
13 exclusion for over-the-counter drugs and urge CalRecycle  
14 to maintain this important exclusion in the final  
15 approved regulation. As we've previously discussed,  
16 these medical products, which were exempted in statute  
17 and included as part of FDA's review and requirements.  
18 And we think that it is important that that exclusion be  
19 maintained in the final regs.

20 With regard to reusable and refillable, CMTA  
21 strongly supports maintaining the change in that  
22 section to avoid applying uniform requirements to the  
23 design and labeling of reusable and refillable packing  
24 regardless of the significant differences in packaging,  
25 recognizing that there are changes and differences that

1 should provide for flexibility.

2 In terms of the exemption duration, we  
3 strongly support maintaining the change and exemption  
4 from one year to two years, which provides longer period  
5 for certainty for producers who may be granted  
6 exemptions.

7 On the post-consumer content credit, although  
8 SB 54 requires CalRecycle to determine a 2023 baseline  
9 for purpose of measuring overall source reduction, it  
10 should be clear that nothing in Senate Bill 54 itself  
11 requires CalRecycle to adopt a 2023 baseline for purpose  
12 of determining this credit. I really believe greater  
13 flexibility would be helpful and important.

14 On the malice fee section, as CMTA also urges  
15 the Department to add language recognizing that under  
16 the office of -- environmental health hazard assessment  
17 and Proposition 65, there are thresholds set for various  
18 chemicals under Prop 65. And the malice fee should be  
19 accordingly and aligned with those level settings and  
20 address that issue as part of malice fee determinations.

21 And then finally, on behalf of the California  
22 Council for Environmental and Economic Balance, CCEEB  
23 urges the department to provide added clarity and  
24 guidance on business-to-business related packaging for  
25 producers.

1           They continue -- many producers who may not be  
2 consumer-facing producers for the purposes of SB 54 but  
3 who may, indeed, have obligations for compliance are  
4 largely focused on business-to-business transactions and  
5 packaging within their business-to-business, still are  
6 continuing to struggle with a lack of clarity as it  
7 relates to the producer definition, that hierarchy, what  
8 have you.

9           And so we really urge the Department to  
10 continue to work on providing added clarity through  
11 additional guidance, frequently asked questions, FAQs,  
12 and to ensure all entities that have compliance  
13 requirements, even if they're not consumer-facing  
14 packaging, are clear and understand what that entails.

15           On the issue of alternative collection, CCEEB  
16 urges the Department to further revise the definition of  
17 alternative collection. Continue to have concerns that  
18 as it relates to that, that it could have an impact and  
19 undermine franchise agreements that were not part of any  
20 kind of agreement under SB 54. The intention was always  
21 to uphold franchise agreements and the important  
22 contracts related to those.

23           In terms of responsible in-markets and  
24 responsible in-markets for plastics, CCEEB supports the  
25 revisions made to the regulation related to whether

1 material recovery facilities creating flake or pellet  
2 are considered end markets. So really just want to  
3 ensure added clarity.

4 While we appreciate some of that language was  
5 adjusted, we do believe that there continues to be a  
6 little bit of ambiguity as it relates to having removed  
7 flake, but continuing to maintain pellets, pellet  
8 manufacturing, or processing in that scope.

9 And then finally, with regard to exemptions  
10 and extensions for local jurisdictions and recycling  
11 service providers, the regulations state that the local  
12 jurisdictions and recycling service providers'  
13 obligation to collect material on the CMC list do not  
14 take affect while CalRecycle is deciding on an  
15 application or an extension or exception.

16 To align this with the eyesore sections on the  
17 topic, the final statement of reason should clarify that  
18 a request to the Department pursuant to those sections  
19 is a notification of the intent to file an application.  
20 That application would meet the criteria under  
21 18980.11.1 and be considered by CalRecycle for approval  
22 or denial.

23 This clarification would ensure that the  
24 consultation process with the PRO as required serves its  
25 intended purpose and local jurisdictions and recycling

1 service providers are not subject to penalties during  
2 that consultation process, which the PRO has discretion  
3 to extend.

4 With that, I appreciate your time. And thank  
5 you for your consideration.

6 MR. CASTLETON: Thank you for your comment.

7 We're going to take one more in person  
8 comment, and then I believe we have a couple of hands  
9 raised on Zoom.

10 And we will also aim to take a lunch break  
11 around 12:00 o'clock. But also in the spirit of  
12 receiving your comments, if you want to make comments  
13 now, please just line up and we will take them before  
14 lunch break. Thank you.

15 MR. WEBER: All right. Terry Weber, American  
16 Forest and Paper Association. We are the national trade  
17 association for America's paper mills and, importantly,  
18 the paper-based packaging manufacturers.

19 We represent about 90 -- 70 million tons of  
20 production capacity. Also importantly, we recycle about  
21 46 million tons of paper every year at our mills. So  
22 we'll be submitting detailed written comments covering  
23 all of our issues. But just a couple I'd like to  
24 highlight in verbal comments.

25 You know, it's been said, but it -- the

1 exemptions that are written into the legislation were  
2 really important from the perspective of our industry.  
3 And it's important that CalRecycle honor the legislative  
4 language through the regulation. And we feel like the  
5 draft regulations are still falling short in a couple of  
6 areas.

7           One exemption that's really important to our  
8 industry is the exemption for source-separated material  
9 that can demonstrate a recycling rate of at least  
10 65 percent until 2030. And then it goes to 70 percent.

11           Right now as the regulations are drafted, it  
12 reads as though individual producers would need to  
13 document that their specific box, for example, flows  
14 through the collection system and it is recovered at a  
15 rate of 65 to 70 percent.

16           Practically in the real world, that is not  
17 going to be possible. It's not a question that's going  
18 to be knowable. Our industry has a lot of experience in  
19 these statistics.

20           We'd prefer to see an approach that's based on  
21 covered material category. We can substantiate that the  
22 recycling rate for boxes that flow through commercial  
23 collection source-separated by store typically have a  
24 recycling rate of about 95 percent. So well in excess  
25 of the thresholds met in the -- met in the -- stated in

1 the legislation. We need the regulations to reflect a  
2 process that allows us to access the off-ramp as was  
3 negotiated in the legislature.

4 And then the second piece that's really  
5 important to our membership that Dawn just mentioned is  
6 the exemption around de minimis. So right now, what  
7 we're being told and was, you know, in the draft  
8 guidance that CalRecycle issued in late August around  
9 plastic source reduction is that we need to report the  
10 adhesive content of our boxes.

11 And there's -- it's not really clear in the  
12 regulatory package, you know, the legislation by  
13 CalRecycle with the authority to decide what constitutes  
14 de minimis. It's not clear how that process is going to  
15 work. And what our members are being told by Circular  
16 Action Alliance right now is that they have to report  
17 all that data, CAA will apply for an exemption, and then  
18 CalRecycle will decide whether the de minimis  
19 qualification is met.

20 Well, that's an enormous amount of regulatory  
21 and reporting cost for our membership to undertake  
22 for -- to report data that will ultimately, from a  
23 regulatory standpoint, be meaningless.

24 So we feel very strongly that in order to be  
25 consistent with the governor's intent as he stated in

1 pulling back and rewriting these regulations, that  
2 CalRecycle needs to take a look at that de minimis  
3 exemption and offer some guidance, and clear guidance,  
4 about what is going to qualify as de minimis.

5 And that needs to be done ahead of time so  
6 that we don't have to go through this tremendous  
7 data-gathering exercise to report data that's  
8 ultimately, from a regulatory standpoint, going to be  
9 meaningless.

10 MR. CASTLETON: Thank you for your comment.

11 I believe we have three hands raised on Zoom,  
12 so we'll take those. And then we will come back to the  
13 room for any more in-person comments before lunch break.  
14 Thank you.

15 MS. RICHMOND: Emma, I'm going to ask you to  
16 unmute yourself.

17 (Technical difficulties)

18 (Reporter clarification)

19 MS. MOORHEAD: I can fix my microphone, and  
20 then if you want to come back to me after the other two  
21 hands go.

22 MR. CASTLETON: Thank you. We appreciate  
23 that. We'll move to the next hand raised, and then  
24 we'll come back to this commenter. Thank you.

25 MS. RICHMOND: David, I'm going to ask you to

1 please unmute yourself.

2 MR. KRUEGER: Thank you. I'm David Krueger,  
3 executive director of the Central Contra Costa Solid  
4 Waste Authority.

5 And the communities that we serve very much  
6 support the intent of SB 54, particularly the intent to  
7 shift the costs of recycling from the local governments  
8 and ratepayers to the producers. And also, the intent  
9 stated in SB 54 that there won't be any new costs on  
10 local governments, because it wouldn't be recovered from  
11 the PRO.

12 However, I think the regulations as written  
13 are lacking some important language to make that happen.  
14 We're submitting four comments, but I'm going to  
15 highlight this one section here.

16 Some of what's lacking is a requirement that  
17 service providers actually participate in the EPR  
18 program. That might sound odd, but it's actually  
19 already happened in other California programs. We've  
20 seen it with the mattress recycling PR program where  
21 some service providers had refused to participate  
22 because it would prohibit them from charging the public.

23 We've also seen recently with CAA and  
24 CalRecycle trying to survey service providers to get the  
25 baseline data needed for this process, and many of them

1 have opted not to comply. So I think there is a need  
2 for the regulations to require the service providers to  
3 seek the funding.

4 The concern is that if the service providers  
5 have new costs necessary to meet SB 54 and they perceive  
6 it's going to be easier for them to get that funding  
7 from the ratepayers from the local jurisdictions as  
8 opposed to from the PRO, that that's where they'll go  
9 first. So I think there needs to be a regulation to  
10 make sure they participate.

11 And when they do participate, as mentioned by  
12 other folks, we need to look out for the possibility of  
13 double-dipping. Of a service provider recovering costs  
14 from the PRO and then recovering those same costs from  
15 the jurisdictions and the ratepayers. That needs to be  
16 prohibited in law and regulation.

17 And you can't really rely on local  
18 jurisdictions and franchise agreements to enforce that.  
19 Doing so would put an unnecessary burden on local  
20 jurisdictions, especially the smaller ones that don't  
21 have lots of staff and so forth, and that is this type  
22 of thing. And might also require a mass -- you know, a  
23 minimum of franchise agreements throughout the state,  
24 which is not really a productive use of time.

25 So most of the current franchise agreements

1 didn't really anticipate SB 54 and EPR. And instead of  
2 having everyone have to rewrite their franchise  
3 agreements, it would be more efficient for the State  
4 simply to enforce these requirements to prevent the  
5 double-dipping.

6 In addition to double-dipping, we want to make  
7 sure that when service providers get funding from the  
8 PRO that actually reduces their operating costs, that  
9 their customers benefit from that as well. That that  
10 savings is shared with the ratepayers with the local  
11 jurisdictions.

12 Anyway, thank you for listening to these  
13 comments. I appreciate your time. And thanks again.  
14 Bye.

15 MR. CASTLETON: Thank you for your comment.

16 MS. RICHMOND: Looks like the next hand raised  
17 is Reit. Please unmute yourself. Thank you.

18 MS. VOORHEES: Hi. Can you hear me?

19 MS. RICHMOND: Yes, we can hear you.

20 MS. VOORHEES: Thank you. Good afternoon.

21 My name is Reit Voorhees, and I'm speaking on  
22 behalf of the Environmental Services Department for the  
23 City of San Jose.

24 As the third most populous city in California,  
25 we are highly supportive of SB 54, the goals of reducing

1 plastic pollution, shifting the packaging responsibility  
2 to producers, and lessening the financial burden on most  
3 local jurisdictions, waste collection, and processing of  
4 covered materials. We are -- we have submitted  
5 extensive comments already, but I do want to highlight a  
6 few concerns that we have about the written regulations.

7 We strongly believe that section 18980.2,  
8 meaning section (a)2, which significantly expands the  
9 number of products that would be category 3 excluded,  
10 must be deleted. If it's not removed, it would directly  
11 conflict with statute and result in the failure of the  
12 State to implement SB 54 as retired by statute.

13 Instead of just expanding the proposed  
14 regulations, this continues to allow producers to apply  
15 for the unique challenges exemptions outlined in section  
16 18980.2.4. Relying on exemptions instead of broadly  
17 applicable exclusions would require these producers to  
18 remain part of the SB 54 system and create a safe  
19 pathway for producers to onboard materials as it becomes  
20 feasible to do so.

21 The (inaudible) that CalRecycle published in  
22 June 2025 estimates that the total benefits of SB 54 are  
23 over \$53 billion. However, this estimate assumes that  
24 SB 54 is implemented as intended by the State of  
25 California. If a large percentage of the products that

1 are currently required to be covered by statute pursue  
2 categorical exclusions under the proposed regulations,  
3 these benefits, public health, reduced environmental  
4 impacts, and savings for taxpayers would not be  
5 realized.

6           Additionally, SB 54's intent to reduce the  
7 financial burden on ratepayers would also be unmet as  
8 many types of packaging intended to be covered under  
9 SB 54 would be categorically excluded from all current  
10 (inaudible) requirements to meet SB 54's recycling rates  
11 and recyclability mandates.

12           I wanted to echo some of the concerns that are  
13 already been mentioned about enforcement on local  
14 jurisdictions. The \$50,000 per day fine for  
15 noncompliance, we believe there's discrepancy between  
16 SB 54's intention as an EPR law and the enforcement on  
17 local jurisdictions for those requirements.

18           And we also wanted to highlight that SB 54  
19 requires the PRO to reimburse local jurisdictions and  
20 service providers for cost incurred to implement SB 54.  
21 And that includes the cost of consumer education,  
22 collection, processing, storage, and transportation of  
23 covered materials.

24           However, under the current regulations, the  
25 cost for that same type that are already being incurred

1 by jurisdiction, it only allows us to cover the amount  
2 of increase that's caused by the requirements of SB 54.  
3 Separating both costs that are due to the existence of  
4 SB 54 would prove extremely difficult and incredibly  
5 burdensome for jurisdictions. This language in the  
6 regulation should therefore be (inaudible) be left.

7 And I will thank you for the time and  
8 consideration. We look forward to working with  
9 CalRecycle as they continue to draft these regulations.  
10 Thank you.

11 MR. CASTLETON: Thank you for your comment.

12 MS. RICHMOND: All right. Emma, I'm going to  
13 go ahead and ask you to unmute. And then once you  
14 provide your comment, we will move to the last speaker  
15 in Zoom.

16 MS. MOORHEAD: All right. Does this sound  
17 better? Okay. Great. Thanks so much.

18 Hi. My name is Emma Moorhead. I am from  
19 Oakland, California. I now live in Sacramento. I work  
20 with CALPIRG students at UC Davis, so I'm here to speak  
21 on tens -- speak on behalf of tens of thousands of  
22 California students who have supported passing SB 54 and  
23 want it to be implemented effectively to achieve its  
24 goal of significantly limiting plastic pollution.

25 Plastic pollution has been rising my entire

1 life. I spent my childhood going camping with a group  
2 of other students. It was a great opportunity to get  
3 out of the city and to experience nature in California.

4 Throughout the end of each camping trip, I  
5 would be brought back to reality when we would spend an  
6 hour picking up hundreds of tiny pieces of trash at our  
7 campsites and the surrounding area, forests, beaches,  
8 creeks, lakes.

9 I don't want a future where myself and my kids  
10 are constantly exposed to microplastics. And the  
11 beautiful, natural environment that we're really lucky  
12 to experience in California is filled with plastic trash  
13 everywhere. So there are two specific problems that we  
14 urge CalRecycle to resolve before finalizing the  
15 proposed regulations.

16 Similarly as colleagues of mine have spoken on  
17 before, first we urge CalRecycle to not weaken the  
18 protections against chemical recycling, which is a false  
19 solution to our plastic pollution crisis. The process  
20 is polluting and energy-intensive and does nothing to  
21 stop the production of new single-use plastics.

22 And second, we urge CalRecycle to remove the  
23 new FDA USDA exclusions. Without these changes, I  
24 really do worry that this law will not do what it was  
25 intended to do and what those thousands of students

1 worked really hard to pass. We want to significantly  
2 limit plastic pollution and set the stage for a cleaner  
3 and healthier California.

4 So thank you so much, and thanks for the  
5 opportunity to comment.

6 MR. CASTLETON: Thank you for your comments.  
7 I believe we have one final Zoom, and then we will start  
8 on this side of the room for in-person. So final Zoom  
9 person, we will unmute you. Thank you.

10 MS. RICHMOND: Neil, I'm going to go ahead and  
11 ask you to unmute yourself.

12 MR. EDGAR: Good morning. Neil Edgar on  
13 behalf of the California Compost Coalition. My comments  
14 reflect those of my composter members. They're not on  
15 behalf of the SB 54 advisory board.

16 Despite assertions from producers, CCC has no  
17 desire to limit or ban compostable packaging. In fact,  
18 California compost manufacturers are receiving and  
19 processing hundreds of tons of food, soil, paper, and  
20 fiber every day.

21 Bioplastic materials, however, are not  
22 functional in collection and composting systems at the  
23 scale of services being delivered by commercial  
24 operators in California. California composters have  
25 decades of experience in working with the jurisdictions

1 they serve trying to make compostable plastics work and  
2 have learned many costly lessons about how they don't.

3 We fully understand the difference in  
4 manufacturers have sunk -- the difference between the  
5 investment manufacturers have sunk into making  
6 functional packaging for delivering food to consumers  
7 safely. And what is functional at the end of life in  
8 composting facilities that are relied upon to manage  
9 that waste?

10 My members operate composting facilities that  
11 have invested millions of dollars in environmental  
12 compliance measures and must meet the demands of their  
13 primary agricultural markets to manufacture the highest  
14 value compost products they can in order to meet very  
15 ambitious revenue targets. Food service ware and  
16 packaging marketed as compostable presents significant  
17 challenges to compost manufacturers that impair its  
18 ability to function as a circular solution.

19 There are contamination impacts. Removing  
20 contamination from compost during the manufacturing  
21 process is job number one for composters. Quite simply,  
22 we need to keep plastics out of compost. Plastic  
23 contamination, including from bioplastics which meet lab  
24 biodegradation standards in ASTM D6400 represent the  
25 largest threat and processing cost to compost

1 production.

2 As SB 1383 collection programs have increased  
3 in number and volume, the costs of removing increasing  
4 plastics contamination has risen significantly. ASTN  
5 marketing standards require materials that 90 percent  
6 disintegrate maybe for days and 90 percent biodegrade  
7 within 180 days. Those standards do not reflect the  
8 production cycles for commercial composters who must  
9 move a finished product to market within 90 days. Any  
10 partially degraded visible plastic is very difficult to  
11 remove and will devalue the compost.

12 We have a lack of proper labeling and  
13 enforcement. California has adopted labeling standards  
14 for compostable products under AB 1201. Existing  
15 statutory requirements found mainly in Public Resources  
16 Code 42357(g) are not being enforced. A large  
17 proportion of these products sold in California are not  
18 clearly labeled, causing confusion for consumers and  
19 adding cost unnecessarily as they are typically disposed  
20 of following costly removal.

21 Consumer confusion is leading to higher costs  
22 and contamination. Compostable plastics are often  
23 confused with conventional disposables, which they are  
24 often designed to mimic, leading to contamination in  
25 both the compost and recycling streams, increasing

1 processing costs for ratepayers and customers, and  
2 reducing the marketability of material due to the  
3 physical contamination resulting from the acceptance of  
4 packaging at large with food materials.

5 While fiber and paper compostable products  
6 come with their own potential contamination challenges,  
7 composters have not found nearly the level of impact on  
8 product quality that comes with plastics.

9 It also creates a permission structure for  
10 increasing contamination. Despite signage and other  
11 education, many users lost in the confusion of multiple  
12 products, resin types, and conflicting messages  
13 carelessly throw all food-associated packaging into  
14 their green bin, leading to the need for mechanical  
15 separation which wastes additional food and increases  
16 cost for processing.

17 Compostable plastics are not allowed in  
18 certified organic agriculture and are not desired by  
19 farmers. California farmers buy over 60 percent of our  
20 compost and want product that is allowable for use in  
21 certified organic agriculture as a means of assuring  
22 quality. Under the National Organic Program rules,  
23 plastic is considered a synthetic product, which is not  
24 allowed even if it's compostable.

25 Toxicity and microplastic concerns are

1 emerging. Some compostable products still contain  
2 harmful chemicals like PFOS, which do not break down  
3 during composting and can contaminate soil and water.  
4 Other polymers and chemical constituents are also  
5 concerning.

6 While the science and understanding of  
7 microplastics is emerging, there is evidence that in the  
8 absence of specific composting conditions, moisture  
9 content, adequate temperature, et cetera, some of these  
10 compostable plastics generate microplastics like their  
11 conventional plastics they mimic, causing all of the  
12 same environmental damage to soil and impairment of  
13 plant function.

14 We will be submitting comments to largely  
15 support the existing language under section 18980.3, the  
16 eligibility to be labeled compostable, and 18980.4,  
17 which defined responsible end markets for compostables.

18 Lastly, we'll be asking for a reinstatement of  
19 a definition of desirable organic waste, which is  
20 referenced in these sections.

21 Thank you for the opportunity to comment.

22 MR. CASTLETON: Thank you for your comment.  
23 We will now switch back to in person.

24 MR. DE THOMAS: Thank you so much. My name is  
25 Dylan de Thomas. I lead state policy work for The

1 Recycling Partnership. I wanted to start -- and I'm  
2 going to do a little weird stance here so I can get down  
3 here.

4 I wanted to thank CalRecycle staff for the  
5 incredible amount of hard work and challenging  
6 circumstances of trying to get this regulatory package  
7 over the line. And I'm going to share a few comments  
8 here, but really we'll have a full robust letter as we  
9 typically do later on today. Like many of the other  
10 speakers, I also wanted to echo a fair amount of what  
11 some of the other speakers had said.

12 But wanted to lead with just to -- we want to  
13 make sure that we see the impacts of this law being  
14 implemented. And we feel we are aligned with CalRecycle  
15 as well as the designated producer responsibility  
16 organization that for the implementation to stay on  
17 time, we support the goal of adopting the final  
18 regulations by Jan 1, 2026.

19 We don't take this lightly. We know that  
20 there are some real changes that need to happen to the  
21 regulations to be able to make the law work into the  
22 future.

23 But we still believe that the regulation, the  
24 regulatory package currently before us, should be  
25 finalized. And then immediately following finalization,

1 announce plans for additional rulemaking at the earliest  
2 possible time for -- after that regulation adoption  
3 occurs.

4 Okay. But recognizing that changes may be  
5 necessary, we have -- and there would be another 45-day  
6 public comment period. We wanted to highlight some of  
7 the top priority concerns that if changes are to be  
8 made, that these are the changes that should be focused  
9 on.

10 The first and foremost, echoing a lot of the  
11 earlier comments that happens -- that others have said  
12 is about the categorical exclusion for packaging that  
13 conflicts with federal regulation. It's going to be  
14 highly disruptive to the SB 54 implementation piece.

15 Our initial suggestion is that the provision,  
16 the new provision that was in the most recent regulatory  
17 package just be deleted entirely. There would still be  
18 an option to request for a more limited exemption due to  
19 unique compliance challenges and/or health and safety  
20 concerns.

21 We feel that this is sufficient to be able to  
22 address some of the concerns from other folks in  
23 industry that have highlighted for packaging that is  
24 necessary to be able to deliver their products to  
25 marketplace. There already is a process in place, and

1 we think that that is robust and necessary.

2 If you do keep the current approach, then we  
3 would suggest a few changes. Primarily that the  
4 exclusions would be limited to two to three years and  
5 then require resubmission. That we require CalRecycle  
6 to make rapid rulings and have those rejections be  
7 effective immediately so the producer responsibility  
8 organization can properly plan and make sure that  
9 they're able to reach the robust rates and dates in  
10 statute.

11 We believe there should be an annual deadline  
12 for submissions that take effect in the following year  
13 and initially 30 days after the regulations are adopted  
14 to only allow SB 54 producers to file for exclusions.  
15 And also to identify a more objective and measurable  
16 standard than, quote, not reasonably possible to use  
17 other packaging.

18 So that way producers are able to identify  
19 what packaging they can use and cannot use, and it's not  
20 as vague. It's not -- we also feel, and this is  
21 something that we've said a number of times in earlier  
22 comments, is that there needs to be greater clarity and  
23 a viable pathway for recyclable designations via  
24 alternative collection either alone or in combination  
25 with local jurisdictional programs as in 18980.3.

1           We really think that, especially as we were  
2 looking at packaging that, you know, if there is good  
3 redesign and there's a good focus, especially for  
4 challenging packaging to recycle like film and  
5 flexibles, that there's going to be innovative  
6 collection modalities that are going to have to be  
7 implemented.

8           And we believe that there should be an optimal  
9 mix of local and alternative collection, still making  
10 sure, of course, materials are going to responsible end  
11 markets as defined. And we think that there needs to be  
12 some additional clarity delivered via the next  
13 regulatory package.

14           And one of those suggestions that we're making  
15 is that for a local program recyclable pathway, that a  
16 local program could include any program included in our  
17 PRO contract with a local jurisdiction and their service  
18 provider or recycler.

19           Additionally, there's some regulatory language  
20 that could be clarified around a -- another designation  
21 for recyclability, which would be allowing for the PRO  
22 to request CalRecycle designations if there's a  
23 reasonable likelihood to satisfy any of the other three  
24 SB 343 recyclability criteria within a particular time  
25 period, as well as an application process to the

1 director to make sure that if packaging is collected,  
2 that it would not reasonably confuse consumers as well  
3 as increase contamination in the recycling system.

4 I also wanted to suggest under the responsible  
5 end markets program to look to Oregon, as it is working  
6 to finalize its program plan amendment. And the  
7 approach that CAA has put forward before the EQ and its  
8 advisory council, the Recycling Advisory Council, which  
9 I happen to sit on, although I'm not speaking for that  
10 advisory council now, they are currently looking at a  
11 third-party designated responsible end market  
12 verification process that will have far-reaching  
13 effects, as well as impacting California's approach on  
14 responsible end markets.

15 And would encourage CalRecycle in looking at  
16 the regulations around responsible end markets to  
17 coordinate with Oregon's EQ as well as CAA as they are  
18 working to finalize what that third-party verification  
19 program looks like -- protocol, rather.

20 And then, lastly, we wanted to suggest to help  
21 the universe of producers that are going to be impacted  
22 by this program as well as other interested parties that  
23 all stakeholders need to prepare for SB 54  
24 implementation. That CalRecycle prepares additional  
25 guidance documents as well as holding informal

1 discussions very quickly on how enforcement of interim  
2 recycling rate mandates and related activities will play  
3 out, as well as demystifying the 343 labeling standards  
4 or the 54 recyclable or compostable mandate. Just  
5 guidance documents, informal meetings. That's something  
6 we've called for for many months now, and hope that  
7 CalRecycle is able to do that.

8           And then lastly, we just wanted to say that we  
9 understand it's very complicated. But the negotiated  
10 SB 54 law that's in statute did allow for compostable  
11 packaging. And I believe that there should be a  
12 pathway, a clear regulatory pathway to be able to  
13 evaluate compostables for designation of compostability  
14 under 54.

15           And with that, the rest will be in our letter.

16           Thank you.

17           MR. CASTLETON: Thank you for your comment.

18           MR. FARNOUSH: Good afternoon. My name is --  
19 good afternoon. Can you hear me?

20           MR. SANTILLANO: We need you to stand a little  
21 bit closer. If we can raise it.

22           MR. FARNOUSH: Is this better? Can you guys  
23 hear me?

24           Good afternoon. My name is Dara Farnoush, and  
25 I am a student at UC Davis. I also am the president of

1 the Surfrider chapter at Davis and the -- and I sit on  
2 the board of the CALPIRG students chapter.

3 In my comments today, I'd like to focus on the  
4 allowance of chemical recycling and the fact that it  
5 will cause a need for new virgin plastics instead of  
6 actually recycling the plastic.

7 Through both my classes and my cleanups, I've  
8 come to learn just how much plastic goes into our  
9 environment. I think this statistic was mentioned  
10 earlier, but about a dump truck's worth of plastic gets  
11 dumped into the ocean every 45 seconds.

12 Plus, nearly half of all plastics that are  
13 produced are meant to be used just once. After that,  
14 they're thrown away and they end up -- and they show up  
15 everywhere. From the soil at the bottom of the ocean to  
16 every single person's brain and bloodstream.

17 I was visiting Big Bear Lake with my family.  
18 And while we were hiking along the edge of the lake, we  
19 -- my dad mentioned how beautiful the nature is and how  
20 lovely the view is. And we couldn't tell that there was  
21 a whole town across the street when we looked out over  
22 the lake.

23 I pointed out a plastic bottle and a chip bag  
24 that were floating by the edge of the lake. For me,  
25 they ruined the view, but I was quickly able to put them

1 out of my head, because I'm used to seeing plastic on  
2 beach cleanups and hikes that I've done throughout the  
3 last couple years.

4 My dad, on the other hand, couldn't put it out  
5 of his head. During the rest of our lap, he kept  
6 noticing the plastic trash all around the lake and the  
7 trail. And I felt horrible that I shattered his  
8 rose-colored glasses. But it definitely showed both of  
9 us how much work there needs to be made to clean up our  
10 environment and clean up plastics from our lifestyles.

11 Chemical recycling doesn't actually solve any  
12 of these problems, since it just incinerates the  
13 plastic. And on top of not reducing our need for new  
14 plastics to be created, it creates toxic pollutants that  
15 harm our environment and threaten public health.

16 Plus, current regulations have a lot of  
17 sweeping exemptions. Which means that a lot more  
18 plastic is being sent to landfills or discarded into our  
19 environment than is necessary. So I'm asking CalRecycle  
20 to strengthen the regulations so that only real  
21 recycling technologies are allowed in California, not  
22 chemical recycling.

23 On top of that, I'm asking CalRecycle to not  
24 allow for broad exclusions for packaging of  
25 over-the-counter drugs and food or ag products. But

1 instead to institute an exemption process so that not  
2 only those who need it are exempted. These changes will  
3 lead to more real recycling and therefore, less plastic  
4 in our parks, waterways, and landfills. And it will  
5 create less demand for new plastics to be produced.

6 Thank you.

7 MR. CASTLETON: Thank you for your comment.

8 MR. SUTTON: Hi. Thank you. I'm Matt Sutton  
9 with the California Restaurant Association. We  
10 represent about 22,000 eating establishments throughout  
11 the state ranging from single-unit operators to  
12 multichain national operators.

13 We participated in the legislative process of  
14 SB 54 for many years and at each turn in the regulatory  
15 journey as well. And the stakes are incredibly high,  
16 obviously, for everybody but for neighborhood  
17 restaurants in particular.

18 There's been no shortage of news coverage over  
19 the last few years in the state newspapers and national  
20 newspapers about the challenges that the restaurant  
21 community faces, particularly the affordability crisis  
22 that restaurant operators everywhere in the state  
23 continue to face.

24 So restaurants are the end users of many of  
25 these products that we're talking about today and have

1 talked about for years in this context. So we know that  
2 by its very nature, an extended producer responsibility  
3 program is going to send some costs downstream to us.

4 That's acceptable. It's normal. We want to  
5 be incredibly delicate with that. We're real about  
6 those coming down to us as end users. But we just can't  
7 stress enough the need and the fragility of the  
8 restaurant community right now and the need for that to  
9 be done delicately.

10 So our comments today will be submitted.  
11 They're going to offer more context and clarity on a  
12 number of fronts. I'll keep it brief here, because I  
13 know what stands between you and lunch is probably me.

14 So at this time we're focusing on some  
15 suggested clarity around the issue of, quote, unquote,  
16 obligated producer.

17 We've become aware of a number of scenarios  
18 where the process of identifying who is or who may be  
19 obligated producer is rife with opportunity for multiple  
20 and conflicting interpretations. So we have some  
21 suggestions to clarify that.

22 And we believe by doing that, it will  
23 significantly cut down on the administrative load that  
24 you all face, or CalRecycle faces, and certainly that  
25 the CAA will face. Also, we think it will reduce

1 confusion and questions coming in to you from our  
2 members about a wide variety of scenarios.

3           Lastly, we're offering some suggestions so as  
4 not to exacerbate the current dilemma we already face  
5 with the organic and compostable packaging limitations  
6 so that compostable packaging and packaging in food  
7 service ware can remain a meaningful compliance pathway  
8 for restaurants and for all.

9           Again, we'll provide more detail in our  
10 comments. We wanted to provide a little bit of context  
11 and clarity around a couple specific issues, and that's  
12 what we'll provide today. So, thanks for the time.

13           MR. CASTLETON: Thank you for your comment.  
14 And I believe I saw one more for in-person. So we'll do  
15 one final -- we can do one final in-person comment, and  
16 then we will take an hour break. Thank you.

17           MS. FEARING: Great. Thank you for allowing  
18 me to comment again. I have another client with a  
19 different perspective I wanted to share.

20           Jennifer Fearing on behalf of Community  
21 Alliance with Family Farmers. We are an organization  
22 that represents over 8,000 California smallest and most  
23 vulnerable family farmers, and have worked for over  
24 47 years to preserve family-scale agriculture and  
25 promote environmental sustainability, work closely with

1 growers throughout the state to build healthy soils, and  
2 expand markets for high-quality compost.

3 While CAFF broadly supports California's  
4 world-leading effort to curb the growth of single-use  
5 packaging and plastic food ware framework, we believe  
6 that SB 54's extended producer responsibility framework  
7 has the promise to reducing costs to residents and  
8 businesses, negative impacts on public health, and  
9 environmental degradation. SB 54 can and should  
10 incentivize packaging and food ware producers to  
11 source-produce materials and to shift to materials that  
12 are reusable, recyclable, or compostable.

13 As 54 continues to be implemented, CAFF wants  
14 to urge CalRecycle to support the need for California's  
15 compost to remain a strong, responsible end market by  
16 keeping it free of packaging and food ware that does not  
17 break down, leaches toxic chemicals or additives, or  
18 breaks down into microplastics. A strong body of  
19 science validates concerns that farmers and composters  
20 have about the adverse impacts that such waste will have  
21 on compost integrity and consumer confidence in compost  
22 created in California.

23 It's important to note that California's  
24 agriculture industry purchases well over two thirds of  
25 all compost sold in California, making it the single

1 largest and most promising end market for the material.  
2 Use by growers conventional and organic alike hinges on  
3 product quality. And we cannot risk introducing  
4 contaminants that jeopardize crop safety, farm  
5 certifications, or brand reputation.

6 I could go on. I just want CAFF to be on the  
7 record here. And then we will be in writing as well  
8 that compostable plastics in our farmers' consideration  
9 do not offer any nutrient value. They often contain  
10 toxic additives, and they frequently fail to fully  
11 degrade, leaving behind microplastics that harm soil  
12 health and plant growth.

13 So we urge -- we align our comments with  
14 Neil Edgar's of the California Compost Coalition as  
15 their -- as a primary customer of that. And the end of  
16 that, kind of, circular chain, please protect this  
17 responsible end market by retaining the way the regs  
18 currently treat compostable products. And don't expand  
19 them to inflict compostable plastics into this end  
20 market, causing all kinds of problems.

21 Thank you.

22 MR. CASTLETON: Thank you for your comments.  
23 I think we have one final comment, so please go ahead.

24 MS. LANE: Hi. Shira Lane with Atrium 916.  
25 We're a creative innovation center for sustainability. I

1 just want to put a quick comment on reuse.

2 I, too, with the many comments that have been  
3 heard here feel that with reuse, I wish there was some  
4 kind of threshold so people knew, like, oh, if I did  
5 this, I meet the reuse standard.

6 Right now it's pretty vague. And as  
7 mentioned, I'm worried about the thicker plastic bag  
8 issue. So just putting that out there. I would like to  
9 see reuse take over the world. But, yeah. So, thank  
10 you.

11 And also, I wish these microphones worked  
12 better. Didn't we just, kind of, fix these up?

13 So, thank you.

14 MR. SANTILLANO: Thanks for your comment,  
15 Shira. Great seeing you.

16 MR. CASTLETON: Thank you very much, everyone.  
17 We will now take a one-hour lunch break. So it's now  
18 12:30. We'll come back at 1:30 PM. Thank you.

19 (Lunch recess taken from 12:30 PM to  
20 1:32 PM)

21 MR. CASTLETON: Good afternoon, everyone. It  
22 is a little after 1:30 PM. So we will be restarting the  
23 hearing for the SB 54 proposed regulations in a minute.  
24 We're just waiting for the final member of our panel to  
25 rejoin, and then we will resume receiving comments.

1 Thank you.

2 Okay. Good afternoon everyone. Thank you for  
3 rejoining us. We're now ready to restart or continue  
4 the hearing for the SB 54 proposed regulations.

5 In case you are just joining us, the purpose  
6 of today's hearing is to receive comments on the  
7 proposed regulations. And following the conclusion of  
8 today's hearing and the conclusion of the 45-day public  
9 comment period on October 7th, 2025, all comments  
10 received will be responded to in the final statement of  
11 reasons.

12 To make a comment in person, please line up at  
13 the podium. To make an oral comment via Zoom, please  
14 raise your hand and the host will unmute you. And if  
15 you wish to submit written comments, please submit your  
16 written comments to the CalRecycle public comment portal  
17 by end of the comment period, which is today,  
18 October 7th, 2025. We will take comments first in  
19 person.

20 And seeing no one who is lined up at the  
21 podium, we will check the Zoom to see if there are any  
22 hands raised.

23 MS. RICHMOND: Looks like we have two hands in  
24 Zoom. Caleb, I'm going to ask you to please unmute  
25 yourself.

1 MR. WEISS: Great. Thank you. Hi. My name  
2 is -- can you hear me?

3 MS. RICHMOND: Yes, we can hear you.

4 MR. WEISS: Great. Yeah, hi. My name is  
5 Caleb Weiss, and I'm a campaign associate for  
6 Environment California based in Oakland.

7 I've cared deeply about the environment since  
8 I was a kid growing up in the woods of northern Vermont.  
9 However, I never imagined that we would reach a point  
10 when protecting our environment would be so intertwined  
11 with protecting ourselves.

12 The statistics about microplastics' impact on  
13 health are downright scary. And when coupled with the  
14 terrifying amount of plastic waste that we currently  
15 produce, 2,000 truck loads per day, provide more than  
16 enough reason to significantly limit our plastic  
17 consumption as SB 54 sets out to do.

18 Therefore, I would like to state my strong  
19 opposition to recent provisions which both allow  
20 chemical recycling under certain circumstances and  
21 implement broad exclusions of packaging for  
22 over-the-counter drugs, food, and agricultural products.

23 Both of these practices would significantly  
24 threaten the efficacy of SB 54. Chemical recycling  
25 creates toxic pollutants that harm our environment and

1 threaten public harm, and it does not reduce our demand  
2 for new plastic to be created, which seems kind of crazy  
3 for a recycling policy.

4           Meanwhile, broad exclusions for  
5 over-the-counter drugs, food, and agricultural products  
6 will result in more plastic being sent to landfills or  
7 left to pollute our environment. I urge you, therefore,  
8 to strengthen SB 54 regulations so that only real  
9 recycling technologies are allowed in our state.

10           Furthermore, I ask that you ensure that  
11 packaging for over-the-counter drugs and food and  
12 agricultural commodities are fully covered by the  
13 regulations. Thank you.

14           MR. CASTLETON: Thank you for your comment.

15           MS. RICHMOND: Alexander, I'm going to go  
16 ahead and ask you to please unmute yourself.

17           MR. TRUELOVE: Thank you, everybody. This is  
18 Alex Truelove with the Biodegradable Products Institute,  
19 or BPI.

20           I wanted to focus our comments today on the  
21 responsible end market language as proposed by  
22 CalRecycle. We are concerned that the individual  
23 compostable items are specified to have different end  
24 market requirements, even though they're composted  
25 together typically along with all the organic waste that

1 they help divert.

2 We're also concerned that the compost  
3 facilities as the end markets in this situation are not  
4 required to provide the conditions necessary to  
5 responsibly process those covered compostable products  
6 into a -- well, excuse me -- the stable and mature  
7 finished product. In other words, the responsible end  
8 market language for compostables as written doesn't seem  
9 to require anything of the end market itself.

10 I'll start with the term "biologically  
11 decompose." This continues to be applied in a way that  
12 is unclear, unsupported, and undefined despite our  
13 request to remove this term. The ASTM standard that  
14 support compostable products, D6400, D6868, already  
15 required by California law provide clearly defined and  
16 scientific criteria for both disintegration and  
17 biodegradation, which are defined terms.

18 The latter references, of course, conversion  
19 to CO2 that can only be measured in a lab. So we're  
20 here, again, with this term "biologically decompose"  
21 that feels unnecessary and problematic.

22 In the same section, the regs also do not  
23 require certain paper and fiber-based items to fully  
24 break down, even if they contain persistent polymeric  
25 additives. Which brings up another important point.

1           The term "polymer" needs defining. It's  
2 listed in the definitions, but not actually defined  
3 alongside the term "plastic." Plastic and polymers are  
4 different. They're related. And this is needed to  
5 clarify existing labeling law coming from AB 1201. But  
6 it's also needed to close a dangerous loophole that I  
7 fear is being exploited in this very section of the  
8 regs.

9           To back up for a second, to put this as  
10 plainly as I can and in response to some of the comments  
11 I heard earlier, the suggestion that a product being  
12 made primarily of paper or fiber or being made primarily  
13 of plastic determining its compostability is just a  
14 scientifically-bankrupt position. It's not supported by  
15 science. It's not supported by law.

16           There are compostable paper and fiber-based  
17 items, there are non-compostable paper and fiber-based  
18 items. There are compostable plastic items, there are  
19 non-compostable plastic items. And of course there are  
20 products made from all different kinds of material  
21 combinations.

22           What is clear is that truly compostable  
23 products in California, regardless of material this is  
24 true across the country, are held to the same standard.  
25 Including for toxicity, which I think was referenced

1 earlier as well. Same laboratory methods, same pile  
2 conditions, and they've been verified over and over and  
3 over again.

4 I fear that CalRecycle is confusing market  
5 preferences, which, of course, are real. And they're an  
6 important consideration for composters as a substitute  
7 for science. I'll say that again. CalRecycle should  
8 not confuse market preferences as a substitute for  
9 science. But unfortunately, that appears to be where we  
10 are. This is in the same world where we're seeing food  
11 waste being collected in conventional plastic  
12 polyethylene bags as allowed by California law. Tell me  
13 how that makes sense?

14 Speaking of science, to ensure that  
15 compostable products are given the opportunity to break  
16 down and that they go to a responsible end market, we  
17 need to ensure that facilities are capable of  
18 responsibly processing those products of all material  
19 types.

20 We recommend that CalRecycle consider the  
21 recently published field testing methods, ASTM D8618 or  
22 8619, which offer methods for evaluating compost  
23 operation and applying operating parameters like minimum  
24 residence time, curing time, pot and moisture content.

25 We think it's more than reasonable that

1 composters who wish to participate, of course, and  
2 receive funding through EPR should, according to this  
3 method, submit a test report and prove that their  
4 finished compost is stable, mature, and ensure that  
5 they're capable of responsibly processing compostable  
6 products.

7           So in summary, we should hold both compostable  
8 products and composters to the highest standards.  
9 Compostable products are already required to be tested  
10 and certified. And we have this broad sweep of labeling  
11 requirements that are enshrined in California law.

12           So let's meet in the middle here. Let's avoid  
13 frameworks that betray the statute, and let's not assume  
14 that performance is based on material origin. And  
15 instead, follow the science and the law. Look forward  
16 to submitting written comments, and thanks for the time.

17           MR. CASTLETON: Thank you for your comment.

18           MS. RICHMOND: We have another hand in Zoom.  
19 Felix, I'm going to ask you to please unmute yourself.

20           MR. BOLTON: Hello. I am Felix Bolton. I'm a  
21 student at UC Santa Cruz, and I live -- I am from  
22 Santa Monica and I'm representing CALPIRG, the student  
23 activist group at -- across the UCs.

24           I am here because the equivalent of a dump  
25 truck of plastic goes into the ocean every 45 seconds.

1 The US plastics industry was responsible for at least  
2 232 million tons of CO2 emissions, gas emissions, in  
3 2020, equivalent to an average emissions of 116  
4 average-sized coal-fire power plants.

5 The current regulations do not protect against  
6 harmful chemical recycling, which is mostly just a new  
7 term for incineration. Chemical recycling creates toxic  
8 pollutants that harm our environment and threaten public  
9 health and doesn't reduce demand for new plastic to be  
10 created.

11 Also, the current regulations unlawfully  
12 exclude new broad categories of products, food and  
13 agriculture products, over-the-counter drugs, for  
14 example, which will result in more plastic being sent to  
15 landfills or left to pollute our environment.

16 CalRecycle should strengthen the regulations  
17 so that only real recycling technologies are allowed in  
18 our state, not chemical recycling. CalRecycle should  
19 not allow for broad exclusions of packaging for  
20 over-the-counter drugs and food and agricultural  
21 products, but instead institute an exemption process.

22 Thank you.

23 MR. CASTLETON: Thank you for your comment.

24 I'm seeing no additional hands in Zoom. We'll  
25 invite anyone in person who wishes to make a comment

1 please line up at the podium. And then anyone else who  
2 is on Zoom, if you wish to make an oral comment please  
3 raise your hand and the host will unmute you. Thank  
4 you.

5 And we will continue monitoring the Zoom to  
6 see if there are any raised hands. Also, if anyone in  
7 person would like to make a comment, you're welcome to  
8 line up at the podium.

9 Pending the receipt of any additional  
10 comments, we will keep today's hearing open until 2:30,  
11 and then we'll conclude at 2:30 PM. Thank you.

12 MR. HAMILTON: Hello. Can I be heard? Hello.

13 My name is Tevin, again, from Physicians for  
14 Social Responsibility, Los Angeles. And also with  
15 Environmental Justice Communities Against Plastics, or  
16 EJCAP.

17 I just kind of want to point out the trend  
18 that several people today, either in the room or online,  
19 brought up the technology sections and the chemical  
20 recycling ramifications. I just urge you all to really  
21 hear these pleas.

22 Because these communities, a lot of people  
23 really care about this issue. And you're sending a  
24 clear message that you don't care about our concerns,  
25 our EJ communities, if you allow the regulations to go

1 as they are written now.

2 So I just really want to urge you to really  
3 put in the effort and ask you to work in good faith with  
4 EJ communities and all the concerns that are uplifted  
5 from the people in this room and online about how these  
6 harm our communities and how this can cause long-lasting  
7 impacts across California. Thank you.

8 MR. CASTLETON: Thank you for your comment.

9 MS. RICHMOND: Looks like we have one hand in  
10 Zoom. Judy, you may start saying your comment.

11 MS. SORRE: Hi. My name is Judy Sorre, and  
12 I'm a volunteer and a legislative advocate with 350 Bay  
13 Area Action.

14 We're concerned about several revisions to the  
15 latest draft regulations, especially weakening  
16 protection against the chemical recycling, sometimes  
17 called advanced recycling.

18 In the language of SB 54, recycling does not  
19 include combustion, incineration, or fuel production,  
20 and it says it should minimize environmental and public  
21 impacts. Chemical recycling essentially is incineration  
22 and fuel production, and it does have environmental  
23 impacts.

24 In addition to the CO2 emissions and pollution  
25 produced by the making of many plastic products, this

1 so-called recycling just adds more emissions. Toxins,  
2 such as dioxins and heavy metals which are carcinogens  
3 and neurotoxins, are often admitted during the process.

4 Chemical recycling is also very  
5 energy-intensive. It's primary product is, from 86 to  
6 99 percent, will be burned. And the secondary product  
7 polymers, about 1 to 14 percent will be down-cycled into  
8 another plastic product.

9 Pyrolysis and gasification can produce from 55  
10 to over 200 percent more greenhouse gases than  
11 mechanical recycling. Economically, plastic production  
12 by chemical recycling is between one to ten times more  
13 expensive than plastic -- making plastic from virgin  
14 materials.

15 Few chemical plants are operational in the US,  
16 and they are heavily subsidized. Two plants have  
17 multi-million dollar lawsuits against them. Oregon's  
18 plant, Agilyx, received over 577,000 in tax credits, but  
19 it closed within 16 months.

20 In Rohnert Park, Resynergi is trying to open  
21 a -- it's actually a microwave technology for  
22 incineration of plastics. They've come upon a lot of  
23 community action against them, and it appears that they  
24 may be pulling out of California. They have had too  
25 many hurdles to jump over with public backlash,

1 regulatory hurdles, difficulty permitting, and they need  
2 more environmental incentives.

3           So this advanced or chemical recycling is not  
4 advanced. It is not a solution, and we should avoid it.  
5 We need to enforce the intent of SB 54 to reduce the  
6 amount of plastic we are producing, find safe ways to  
7 recycle it and discard it, and protect our environment,  
8 health, and future. Thank you.

9           MR. CASTLETON: Thank you for your comment.

10           Not seeing any additional speakers in person,  
11 we will once again invite if you want to make an oral  
12 comment via Zoom, please raise your hand and the host  
13 will unmute you.

14           Please submit your written comments to the  
15 CalRecycle public comment portal by the end of the  
16 comment period, which is today, October 7th, 2025. And  
17 we will continue receiving comments at this hearing  
18 until 2:30 PM, pending receipt of any additional  
19 comments. Thank you.

20           MS. RICHMOND: Looks like we have a hand  
21 raised in Zoom. Fiona, I'm going to ask you to go ahead  
22 and unmute yourself.

23           TY: Hello. My name is Ty. I live in  
24 Santa Cruz, and I'm representing CALPIRG.

25           (Reporter admonition)

1 TY: So my name is Ty. I live in Santa Cruz,  
2 and I'm with CALPIRG.

3 And I am here to -- I care about reducing  
4 plastic in our environment. Because there's an  
5 equivalent of a dump truck of plastic that goes into the  
6 ocean every 45 seconds. And the plastics industry is  
7 responsible for billions of tons of CO2 and gas  
8 emissions. And it's equivalent to, like, hundreds of  
9 coal-fired power plants.

10 And current regulations do not protect against  
11 chemical recycling, which is mostly just a new term for  
12 incineration and creates toxic pollutants that harm our  
13 environment and threaten public health.

14 And a new plastic ban needs to be created.  
15 The current regulations unlawfully exclude new broad  
16 categories of products like agricultural products and  
17 over-the-counter drugs, which will result in more  
18 plastic being sent to landfills and polluting our  
19 environment. Thank you.

20 MR. CASTLETON: Thank you for your comment.

21 MS. RICHMOND: It looks like we have another  
22 hand raised in Zoom. Fiona, I'm going to please ask you  
23 to unmute yourself.

24 QUINN: Hello. My name is Quinn, and I'm with  
25 CALPIRG.

1 I grew up in Norway, and there's a lot of  
2 agriculture and nature there. Growing up, I kind of  
3 came to understand the importance of our environment.

4 And when it comes to our legislation, we need  
5 to take into mind how, like, the final decision will  
6 impact our environment. And burning plastics will add  
7 tons of toxicity to the air, which will not only harm  
8 the wildlife but also hurt us in the long term. So I  
9 think it's really important to remember this when making  
10 a decision.

11 MR. CASTLETON: Thank you for your comment.

12 We have no additional people who wish to speak  
13 in person, so we'll now look to the Zoom. If you would  
14 like to make an oral comment via Zoom, please raise your  
15 hand and the host will unmute you.

16 Please submit written comments to the  
17 CalRecycle public comment portal by the end of the  
18 comment period, which is today, October 7, 2025. And  
19 pending the receipt of any additional comments, we will  
20 conclude today's hearing at 2:30 PM. Thank you.

21 I'm seeing no additional people in the room or  
22 hands raised on Zoom. We will thank everyone for  
23 joining us today.

24 If you would like to submit written comments  
25 on this rulemaking, please submit them to the CalRecycle

1 public comment portal by the end of the comment period,  
2 which is today, October 7, 2025.

3 If you'd like to stay informed on the status  
4 of the SB 54 proposed regulations, please subscribe to  
5 the Listservs shown in the presentation slide.

6 Thank you. And that brings today's hearing to  
7 an end.

8 (Whereupon the hearing concluded at  
9 2:30 PM)

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

1 R E P O R T E R ' S C E R T I F I C A T E

2  
3 I, Nick Milana, a Certified Shorthand Reporter  
4 for the State of California, do hereby certify:

5 That the foregoing transcript of proceedings  
6 was taken before me at the time and place set forth;  
7 that the testimony and proceedings were reported  
8 stenographically by me and later transcribed by  
9 computer-aided transcription under my direction and  
10 supervision; that the foregoing is a true record of the  
11 testimony and proceedings taken at that time.

12 I further certify that I am in no way  
13 interested in the outcome of said action.

14 I have hereunto subscribed my name this 7th  
15 day of October, 2025.

16  
17   
18

19 NICK MILANA  
20 CSR NO. 13912

21  
22 (The foregoing certification of this  
23 transcript does not apply to any reproduction  
24 of the same by any means, unless under the direct  
25 control and/or supervision of the certifying reporter)

<hr/>	<b>18980.4</b> 104:16	<b>4,000</b> 18:21	<b>54's</b> 40:3 42:9
<b>\$</b>	<b>1:30</b> 118:18,22	<b>4.1</b> 67:13	43:16 44:16 56:17
<b>\$50,000</b> 46:3 70:1	<b>1:32</b> 118:20	<b>40</b> 70:20	74:10 97:6,10,16
97:14	<b>1st</b> 58:16 74:21	<b>40-year</b> 70:24	116:6
<b>\$53</b> 96:23	<hr/>	<b>42041(AA)5</b>	<hr/>
<hr/>	<b>2</b>	67:24	<b>6</b>
<b>(</b>	<hr/>	<b>42060(d)</b> 68:19	<b>60</b> 103:19
<hr/>	<b>2</b> 55:6,13 64:5	<b>42357(g)</b> 102:16	<b>600</b> 57:2
<b>(a)2</b> 96:8	71:13	<b>45</b> 46:25 111:11	<b>65</b> 86:17,18 90:10,
<hr/>	<b>2,000</b> 120:15	125:5	15
<b>1</b>	<b>200</b> 32:1	<b>45-day</b> 7:18,21	<b>65,000</b> 44:25
<hr/>	<b>2020</b> 126:3	8:16 9:7 106:5	<hr/>
<b>1</b> 59:10 105:18	<b>2023</b> 86:8,11	119:8	<b>7</b>
<b>1,000</b> 51:1 61:8	<b>2024</b> 11:14	<b>46</b> 89:21	<b>7</b> 6:1
<b>100</b> 38:2 65:15	<b>2025</b> 6:1 7:17	<b>47</b> 115:24	<b>70</b> 56:23 71:5,25
<b>10:02</b> 6:2	8:11,16 9:25	<hr/>	89:19 90:10,15
<b>11,000</b> 28:7	10:14 39:11 58:17	<b>5</b>	<b>75</b> 33:19
<b>116</b> 126:3	96:22 119:9,18	<hr/>	<b>750,000</b> 44:23
<b>1201</b> 102:14 123:5	<b>2026</b> 105:18	<b>50</b> 56:25	<b>7th</b> 9:25 39:11
<b>12:00</b> 89:11	<b>2027</b> 12:20	<b>54</b> 6:7 9:6 11:22	119:9,18
<b>12:30</b> 118:18,19	<b>2030</b> 90:10	12:12,24 13:7	<hr/>
<b>1383</b> 102:2	<b>2032</b> 74:21	14:23 19:14	<b>8</b>
<b>16</b> 73:9	<b>22,000</b> 113:10	22:19,22 25:10	<hr/>
<b>180</b> 102:7	<b>22nd</b> 7:17 8:16	26:1 28:5 30:6,25	<b>8,000</b> 115:22
<b>18980.1(a)15</b>	<b>232</b> 126:2	31:11,14 33:23	<b>80</b> 56:23 75:24
83:12	<b>25</b> 74:20	34:7 38:13 39:22	<b>8619</b> 124:22
<b>18980.1(a)8</b>	<b>27th</b> 8:11 51:15	40:9 42:6 43:14	<hr/>
82:25	<b>2:30</b> 127:10,11	44:15 45:11,19	<b>9</b>
<b>18980.1.1</b> 50:15	<hr/>	46:2,8 47:1 48:5,	<hr/>
<b>18980.11.1</b> 88:21	<b>3</b>	10 53:6,20 54:9	<b>90</b> 61:9 79:21
<b>18980.2</b> 40:2	<hr/>	56:5,11 57:19	89:19 102:5,6,9
42:19 96:7	<b>3</b> 59:10 96:9	68:12 69:18 70:18	<b>916</b> 117:24
<b>18980.2(a)2</b>	<b>30</b> 107:13	71:16 72:16,22	<b>95</b> 90:24
45:13	<b>343</b> 26:11 108:24	73:16,18 74:22	<hr/>
<b>18980.2.2(b)</b>	110:3	75:8 76:13 78:13	<b>A</b>
84:12	<hr/>	81:4,7 82:8 86:8,	<hr/>
<b>18980.2.4</b> 96:16	<b>4</b>	10 87:2,20 93:6,9	<b>AB</b> 102:14 123:5
<b>18980.3</b> 104:15	<hr/>	94:5 95:1,25	<b>abandoning</b>
107:25	<b>4</b> 44:22 51:14 55:6	96:12,18,22,24	38:18
	56:2	97:9,18,20 98:2,4,	<b>ability</b> 83:20
		22 100:15 106:14	101:18
		107:14 109:23	
		110:4,10,14	
		113:14 116:9,13	
		118:23 119:4	
		120:17,24 121:8	

- absence** 104:8  
**absent** 30:2  
**absolutely** 63:18  
**abundantly** 60:1  
**abused** 16:15  
**accept** 34:7 37:4 73:13  
**acceptable** 23:8 114:4  
**acceptance** 103:3  
**accepted** 18:8 37:9 73:11  
**access** 46:22 58:1 91:2  
**account** 50:22 79:6  
**accountability** 29:3 30:1  
**accountable** 46:3 59:20 73:21  
**accounting** 53:9  
**accrued** 60:10  
**accumulates** 65:24  
**accumulation** 66:21  
**accurately** 41:22 83:20  
**achieve** 39:23 98:23  
**acknowledge** 35:10 36:15  
**acknowledged** 51:17  
**acknowledging** 14:8  
**Act** 6:8 10:16 11:16 17:6 38:9 62:2 71:3  
**acting** 46:4
- Action** 11:6 69:14 91:16  
**activist** 125:23  
**activities** 110:2  
**actual** 69:3 83:8  
**adapts** 26:6  
**add** 36:22 38:4 86:15  
**added** 84:8,14 86:23 87:10 88:3  
**adding** 73:2 102:19  
**addition** 60:9 95:6  
**additional** 8:6 53:5 58:4 69:5 84:17 87:11 103:15 106:1 108:12 109:24 126:24 127:9  
**Additionally** 47:12 97:6 108:19  
**additives** 116:17 117:10 122:25  
**address** 42:9 43:11 48:23 66:21 86:20 106:22  
**addressed** 28:15 48:1 57:16  
**addressing** 27:20 31:8 42:16 53:13 80:22  
**adequate** 57:3 59:25 104:9  
**adequately** 57:18  
**adhesive** 91:10  
**adhesives** 83:16 84:15  
**adjust** 74:25  
**adjusted** 88:5  
**adjustment** 74:16 75:5
- adjustments** 26:17,20  
**administration** 17:4 77:14  
**administrative** 7:16 8:24 9:1,3 17:6 114:23  
**adopt** 86:11  
**adopted** 17:9 102:13 107:13  
**adopting** 105:17  
**adoption** 106:2  
**advanced** 19:13 30:15,16 58:21 59:22,24 63:11  
**advancing** 50:18  
**advantage** 33:9 37:17,20 78:2  
**adverse** 116:20  
**advice** 51:18  
**advisory** 15:8 22:19 42:6 54:23 55:1 75:13 100:15 109:8,10  
**advocacy** 18:15 54:22  
**advocate** 69:14  
**advocates** 35:2  
**advocating** 81:14  
**affairs** 8:5,7  
**affect** 18:17 71:10 88:14  
**affected** 35:11  
**affiliation** 9:15  
**affordability** 113:21  
**affordable** 14:4 57:5  
**mentioned** 47:20
- afternoon** 82:15 95:20 110:18,19, 24 118:21 119:2  
**ag** 112:25  
**age** 73:9  
**agencies** 14:6 46:4  
**agencies'** 14:8  
**agency** 44:20 51:24 70:8  
**Agency's** 61:2  
**agenda** 7:23  
**agree** 19:9 22:24 24:24  
**agreement** 87:20  
**agreements** 87:19,21 94:18, 23,25 95:3  
**agricultural** 20:24 43:9 47:14 101:13 120:22 121:5,12 126:20  
**agriculture** 103:18,21 115:24 116:24 126:13  
**ahead** 10:5 11:1,2 14:13 39:12 44:7 81:24 92:5 98:13 100:10 117:23 121:16  
**aid** 31:8  
**aim** 89:10  
**aimed** 42:16 68:25  
**air** 20:4 30:19 62:2 72:14,25 73:8,23 74:1  
**AKA** 59:6  
**alarm** 6:24  
**Alex** 121:18  
**Alexander** 121:15

- align** 45:19 70:9  
85:10 88:16  
117:13
- aligned** 86:19  
105:14
- aligning** 14:2
- alignment** 12:4  
56:14 84:21
- alike** 14:12 117:2
- alleging** 63:14
- Allen** 81:4,11
- Alliance** 11:6  
21:25 61:7 91:16  
115:21
- allies** 27:13
- Allison** 47:24
- allocated** 57:15,  
21
- allowable** 103:20
- allowance** 111:4
- allowed** 15:19  
20:7,8 26:16  
47:18 72:17  
80:12,13 81:7,12  
103:17,24 112:21  
121:9 124:12  
126:17
- allowing** 18:1  
23:7 67:16 68:3  
72:21,22 82:12  
108:21 115:17
- alongside** 123:3
- alternative** 35:9,  
14,21 45:7 87:15,  
17 107:24 108:9
- alternatives** 18:1  
30:10 33:19 57:9  
61:8
- ambiguity** 83:7  
84:8 88:6
- ambitious** 12:24  
39:23 101:15
- amended** 44:3
- amendment**  
109:6
- America** 48:8,9,  
22
- America's** 89:17
- American** 24:15  
48:4 49:1,5,7  
89:15
- AMERIPEN**  
24:14,15,18 25:24  
26:8,10,23
- amount** 16:5  
20:13,22 23:21  
41:18 56:11 63:22  
65:5 67:17 69:3  
74:25 91:20 98:1  
105:5,10 120:14
- amounts** 53:18  
54:4 56:19 64:2
- ample** 63:14
- Amy** 43:3
- Amy's** 31:22,23  
32:17,24 34:5  
38:9
- analyst** 24:13
- and/or** 106:19
- Angeles** 21:16  
44:13,16 46:14  
127:14
- Anja** 67:10
- announce** 106:1
- announcement**  
6:22
- announcements**  
6:10
- annual** 107:11
- anticipate** 95:1
- apologies** 61:12
- appears** 32:13  
124:9
- applaud** 59:22,24
- applicable** 96:17
- applicants** 14:15
- application** 53:4  
88:15,19,20  
108:25
- applications**  
40:23 41:19
- applied** 14:17  
122:11
- applies** 84:14
- apply** 91:17 96:14
- applying** 85:22  
124:23
- appoint** 9:19
- appreciates**  
26:23
- approach** 13:21  
14:20 90:20 107:2  
109:7,13
- approaching**  
50:24
- appropriately**  
25:20
- approval** 88:21
- approved** 85:15
- approves** 9:3
- approximately**  
38:11
- approximation**  
37:19
- Aquarium** 39:16  
74:6,12
- Aquarium's** 43:4
- arbitrarily** 26:11
- area** 25:14 26:21  
75:25 99:7
- areas** 14:9 25:4,  
23 26:25 27:22  
68:16,21,22 90:6
- arguing** 17:12
- argument** 80:9
- article** 55:13 56:2  
59:10 67:13 71:13
- articles** 55:6
- Asia** 67:1
- aspect** 39:20  
50:15
- aspects** 82:8
- assembly** 33:6
- assertions**  
100:16
- assessment**  
86:16
- assessments**  
64:25
- assist** 7:2
- assistance** 58:7
- associate** 46:13  
120:5
- association**  
47:25 82:20 84:22  
89:16,17 113:9
- associations**  
11:25 14:14
- assume** 125:13
- assumes** 96:23
- assure** 12:9 71:8
- assuring** 103:21
- ASTM** 101:24  
122:13 124:21
- ASTN** 102:4
- Atrium** 117:24
- attempt** 43:23
- attempting** 58:18
- attendance** 6:12
- attendees** 39:3
- attention** 17:14  
25:3,24 34:3

- attest** 30:1
- attorney** 8:5  
63:13,16 81:21
- audio** 10:2
- August** 7:17 8:16  
10:14 91:8
- author** 81:4
- author's** 43:20
- authority** 26:20  
59:6 74:25 91:13  
93:4
- authorize** 62:21
- authorized** 67:15
- authorizing** 43:7
- average** 126:3
- average-sized**  
126:4
- avoid** 26:21 36:19  
38:13 42:10 68:19  
84:8 85:22 125:12
- avoided** 30:4
- aware** 10:13  
63:13 77:16  
114:17
- awash** 29:11
- 
- B**
- 
- back** 16:24 23:16,  
20 44:8 45:10  
48:12 51:15 52:18  
58:17 61:4 63:6,  
22 81:2 92:1,12,  
20,24 99:5 104:23  
118:18 123:9
- backbone** 59:12
- bad** 80:11
- bag** 77:21 78:1  
111:23 118:7
- bags** 77:22  
124:12
- bail** 36:11
- Balance** 86:22
- balanced** 13:20
- ballot** 17:22 74:23
- ban** 35:12 73:20  
77:21 78:1 81:14  
100:17
- Band-aid** 31:10
- banking** 28:7
- banned** 23:25  
81:11
- bar** 40:21 41:23
- barrier** 34:12
- barriers** 34:16
- bars** 35:7
- base** 49:20
- based** 18:7 26:17  
27:19 43:19 53:18  
68:1,13 69:2 71:2  
84:19 90:20 120:6  
125:14
- baseline** 26:17  
75:2 79:2 86:8,11  
93:25
- basically** 23:3  
70:23 76:9 77:1  
80:9
- Batikian** 44:11,12
- Bay** 39:16 43:4  
74:6,12
- beach** 22:10  
112:2
- beaches** 99:7
- Bear** 111:17
- beautiful** 21:25  
99:11 111:19
- begin** 6:9 9:14  
24:21 61:19
- beginning** 81:10
- begs** 40:25
- behalf** 13:19  
24:14 39:16 44:12  
54:25 72:15 82:18  
86:21 95:22 98:21  
100:13,15 115:20
- beloved** 31:24
- benefit** 36:2 60:20  
95:9
- benefits** 37:7  
62:25 64:21 96:22  
97:3
- best-in-class**  
11:19
- betray** 125:13
- beverage** 85:6,7
- big** 30:13 81:2  
111:17
- biggest** 15:13  
70:5 78:5
- bill** 18:18 19:6  
71:22 86:10
- billion** 96:23
- billion-dollar**  
23:22
- bills** 72:6
- bin** 103:14
- Biodegradable**  
121:18
- biodegradation**  
101:24 122:17
- biodegrade**  
102:6
- biologically**  
122:10,20
- Bioplastic** 100:21
- bioplastics**  
101:23
- BIPOC** 29:5 30:4
- bit** 16:13 17:16  
42:24 58:12 84:18  
88:6 110:21  
115:10
- Black** 22:1 27:8,  
17 28:2 29:9
- blanche** 20:25
- blanking** 22:2
- bloodstream**  
111:16
- blow** 20:20
- board** 22:20 42:6  
54:23 55:1 75:14  
100:15 111:2
- boat-fuel** 65:16
- body** 116:18
- Bolton** 125:20
- boost** 26:6
- borders** 67:1
- bottle** 111:23
- bottles** 84:23
- bottom** 6:19  
111:15
- boundaries** 45:8
- box** 90:13
- boxes** 90:22  
91:10
- BPI** 121:19
- brain** 111:16
- branch** 8:7
- brand** 24:17 117:5
- Brandon** 67:10  
69:17
- brands** 32:17
- break** 48:12  
89:10,14 92:13  
104:2 115:16  
116:17 118:17  
122:24 124:15
- breaks** 116:18
- breathing** 73:23
- bring** 27:14 76:5  
81:1

**bringing** 29:23**brings** 66:16  
122:25**broad** 16:14 32:16  
38:15 47:13,19  
53:2 55:15 57:6  
77:12 83:14,19  
112:24 120:21  
121:4 125:10  
126:12,19**Broad-based**  
35:24**broader** 85:10**broadly** 33:7 34:7  
96:16 116:3**broken** 15:15  
81:1**brought** 29:17  
99:5 127:19**brunt** 22:6**budget** 57:15**build** 27:19 36:10  
48:3,5 49:14  
116:1**building** 7:9 13:5  
27:12**buildings** 44:25**builds** 14:21**built** 73:1**Bunzl** 50:5,6**burden** 29:7  
55:20 59:14 73:23  
76:15 94:19 96:2  
97:7**burdened** 35:23  
57:13**burdensome**  
98:5**burn** 63:25**burning** 76:6**burritos** 32:2**business** 48:15  
50:7 51:5 57:8  
63:16**business-to-  
business** 86:24  
87:4,5**businesses**  
11:20 44:25 50:8,  
22 51:3,9,23 57:4  
71:21 116:8**buy** 48:15 103:19**buying** 48:16**BWW** 27:17 28:4**Bye** 95:14

---

**C**

---

**CAA** 11:13,17,22  
12:9,21 13:9  
91:17 93:23  
109:7,17 114:25**CAA's** 13:3**CAFF** 116:3,13  
117:6**Caleb** 119:24  
120:5**California** 6:1  
11:7 13:13 14:2  
16:10 18:13  
21:11,23 23:16  
27:9 29:6 31:9,24  
35:6 37:3 38:20  
43:4 48:6,8,13,14,  
18 53:24 56:17  
63:7 66:25 72:6,9,  
13,15,19 73:20  
74:2 75:18 76:1,  
15 79:19 80:6  
82:19 86:21 93:19  
95:24 96:25  
98:19,22 99:3,12  
100:3,13,18,24  
102:13,17 103:19  
112:21 113:9  
115:22 116:22,25  
117:14 120:6  
122:15 123:23

124:12 125:11

**California's**  
44:21 62:3 63:13  
66:10 80:13  
109:13 116:3,14,  
23**California-based**  
56:25**Californians** 15:5  
18:19,24 19:1  
20:11 55:11 61:21**Californians'**  
18:17**call** 25:3,24**called** 27:8 30:10  
69:4 110:6**calls** 38:19 42:11**CALPIRG** 18:14  
46:13 55:11 98:20  
111:2 125:22**Calrecycle** 6:13  
7:19 8:18,20 9:5,  
11,24 12:9 13:20,  
25 14:10,13,19  
20:5 21:9 23:23  
24:22 25:11,12  
26:8 31:13 39:10  
40:14,23 41:17  
42:7,19 43:17  
45:12,21 47:16,19  
50:17,21 51:16,22  
53:5 54:6 55:2  
56:18 57:22 58:6,  
9 69:1 72:16  
73:18 75:3 78:20  
85:13 86:8,11  
88:14,21 90:3  
91:8,13,18 92:2  
93:24 96:21 98:9  
99:14,17,22  
105:4,14 107:5  
108:22 109:15,24  
110:7 112:19,23  
114:24 116:14  
119:16 121:22  
124:4,7,20  
126:16,18**Calrecycle's**  
7:13 26:23 41:1  
43:23 45:1 46:6  
51:14 58:2,11**campaign** 27:22  
85:6 120:5**camping** 99:1,4**campsites** 99:7**campuses** 18:25**cancer** 30:23  
65:15,19,24**canned** 32:3**capable** 124:17  
125:5**capacity** 48:21  
54:24 89:20**caps** 49:16 84:23  
85:7**carbon** 65:5 66:3,  
4,8**carcinogenic**  
20:3**care** 64:4 127:23,  
24**cared** 120:7**careful** 54:12**carefully** 74:22**carelessly**  
103:13**carried** 70:1**carry** 71:24**carte** 20:25**carve-out** 45:16**case** 49:19 78:24  
119:5**cases** 6:23**Castleton** 7:12,13  
10:18,25 13:16  
14:24 21:14 24:11  
27:4 31:19 39:2  
42:21,25 44:5

- 46:9 47:23 49:25  
52:16 54:16 59:1  
61:3 67:9 69:1  
72:11 74:4 75:9  
82:14 89:6 92:10,  
22 95:15 98:11  
100:6 104:22  
110:17 113:7  
115:13 117:22  
118:16,21 121:14  
125:17 126:23
- catastrophic**  
34:19
- categorical** 39:25  
40:7 43:7 45:13  
56:15 97:2 106:12
- categorically**  
43:15 54:7 55:17  
97:9
- categorically-  
excluded** 53:1
- categories** 17:4  
20:23 26:4 34:17,  
24 35:15,21 38:16  
47:13 49:24  
126:12
- category** 90:21  
96:9
- Catholic** 75:22
- caused** 27:20  
98:2
- causing** 102:18  
104:11 117:20
- caution** 7:10
- CCC** 100:16
- CCEEB** 86:22  
87:15,24
- ceiling-mounted**  
7:4
- center** 31:15  
117:25
- Central** 93:3
- certainty** 12:19  
86:5
- certifications**  
117:5
- certified** 103:18,  
21 125:10
- Cervantes** 8:5
- cetera** 104:9
- chain** 24:17 50:8  
117:16
- chains** 51:10
- challenge** 51:2
- challenges** 13:2,  
22 16:21 51:21  
83:17 96:15  
101:17 103:6  
106:19 113:20
- challenging**  
105:5 108:4
- chance** 73:25  
76:21
- change** 17:24  
19:4 42:1 68:25  
75:6 78:19 85:21  
86:3
- changed** 48:25  
78:22 79:1
- changing** 17:19  
79:2
- chapter** 59:10  
111:1,2
- charging** 93:22
- check** 119:21
- chemical** 15:17  
19:13 21:20 22:4  
23:25 30:14,18,22  
31:10 47:6,8,18  
53:13,17 54:8  
56:3,10,16,21,22  
61:25 62:4,6,15  
63:12 64:6 65:1,8  
66:3,7,9 69:22  
72:22 73:20 78:9,  
25 81:2,6 82:4  
99:18 104:4 111:4  
112:11,22 120:20,  
24 126:6,7,18
- 127:19
- chemically** 82:1
- chemicals** 20:3  
28:1 53:7 72:25  
86:18 104:2  
116:17
- childhood** 99:1
- chilis** 32:3
- chip** 111:23
- chips** 35:8
- Christine** 44:9,12
- circular** 11:6 13:6  
33:4 35:20 42:2  
48:13 69:15 91:15  
101:18 117:16
- circumstances**  
36:4 105:6 120:20
- cited** 68:7
- citizens** 37:11
- city** 44:12,15,21  
76:2 95:23,24  
99:3
- claim** 28:21 33:9  
40:21
- claims** 41:8 63:8,  
20
- clarification**  
51:20 88:23 92:18
- clarified** 45:18  
108:20
- clarify** 25:18 84:9  
88:17 114:21  
123:5
- clarity** 12:19  
51:12 63:8,18,19  
83:3 84:8,14  
86:23 87:6,10  
88:3 107:22  
108:12 114:11,15  
115:11
- class** 37:15
- classes** 111:7
- clean** 62:2 72:14  
74:1 112:9,10
- cleaner** 100:2
- cleanup** 79:24
- cleanups** 82:10  
111:7 112:2
- clear** 16:10 19:14  
25:5 43:14,21  
51:25 52:6 53:10  
54:24 57:19  
59:10,12,13 69:2,  
22 75:7 86:10  
87:14 91:11,14  
92:3 110:12  
123:22 127:24
- click** 6:18
- client** 24:14  
115:18
- clients** 82:18
- Cliff** 59:3,4
- climate** 62:18  
64:16 66:10
- close** 32:25 37:15  
48:17 123:6
- closed** 22:12
- closely** 115:25
- closer** 84:3  
110:21
- closest** 6:23
- closing** 26:23
- closure** 48:18
- CMC** 88:13
- CMTA** 83:1,12,22  
84:7 85:20 86:14
- CO2** 122:19 126:2
- coal-fire** 126:4
- coalition** 13:18,  
19 21:22,24 22:18  
27:9 37:3 79:20,  
21 100:13 117:14
- coatings** 83:16  
84:15

- Code** 102:16
- coffee** 35:6
- cofounder** 75:11
- Cohen** 70:18
- collaboration**  
46:8
- collaborative**  
14:20
- colleague** 47:6
- colleagues** 19:10  
20:17 27:13 61:20  
65:11 74:12 99:16
- collect** 37:11  
88:13
- collected** 36:21  
37:12 109:1  
124:11
- collecting** 36:8  
48:10
- collection** 35:24  
36:23,24 44:23  
45:7 87:15,17  
90:14,23 96:3  
97:22 100:22  
102:2 107:24  
108:6,9
- college** 18:25
- color** 30:21 73:2  
76:15 79:16 80:19
- combination**  
107:24
- combinations**  
123:21
- commend** 13:20  
25:12
- comment** 7:19,21  
8:17 9:7,18,20,21,  
24,25 10:18 13:16  
14:24 15:11 21:2,  
14 24:11 25:22  
27:4,12,16 28:12  
31:19 39:2,5,7,10,  
11 42:21 43:1  
44:5,14 45:3 46:9  
47:23 49:25 50:4  
52:14 54:16 59:1  
61:3 67:9 69:11  
70:21 72:4,11  
74:4 75:9 76:22  
82:14 89:6,8  
92:10 95:15  
98:11,14 100:5  
104:21,22 106:6  
110:17 113:7  
115:13,15,18  
117:23 118:1,14  
119:9,12,13,16,17  
121:14 125:17  
126:23,25 127:2,7
- commenter**  
92:24
- comments** 7:15,  
20 8:1,18,21,22  
9:5,9,11,13,15,23  
10:1,20,21 11:2,9  
12:21 13:2 15:3,6  
18:5,11 21:20  
22:16,18,19 27:1  
39:9,13,19 44:1,8  
48:24 50:14  
52:15,16,17,24  
54:11,13,24 55:5,  
9 59:7 61:4,13,18  
67:8,12 69:5,19,  
21,24 70:25 71:1,  
18 74:7,10 75:14  
76:22,25 81:15  
82:18,21,23  
89:12,22,24 92:13  
93:14 95:13 96:5  
100:6,13 104:14  
105:7 106:11  
107:22 111:3  
114:10 115:10  
117:13,22 118:2,  
25 119:6,9,15,16,  
18 121:20 123:10  
125:16 127:10
- commerce** 83:8
- commercial**  
44:24 90:22  
100:23 102:8
- commitment**  
13:23 38:13 55:3
- commitments**  
66:11
- committed** 11:18  
12:11 32:5
- committee** 15:9  
34:3 35:4 36:14,  
25 38:12
- commodify** 76:8
- commodifying**  
76:9 82:11
- commodities**  
121:12
- commodity**  
60:22
- common** 32:7
- commonly** 62:14
- communities**  
11:21 19:20 20:14  
21:7,12,18,22,23  
22:5,11 23:10,17,  
20 24:2 27:10,20  
29:5,25 30:4,9,21  
31:2,5,16,17  
42:13 55:10  
57:12,25 58:22  
61:21 68:21,22  
73:2,5,23 75:21,  
22 76:14,20  
79:15,16 80:2,19,  
20 82:10,13 93:5  
127:15,22,25
- community** 17:9  
18:25 22:13 28:4,  
8,11 66:19 73:12  
81:20 113:21  
114:8 115:20
- community-  
based** 12:2
- companies** 34:6  
48:15
- company** 31:24
- comparing** 78:15
- compatible** 64:16
- compete** 48:19  
70:13
- competition**  
70:14
- competitive** 33:8
- complete** 51:3
- complex** 51:9
- complexity** 51:17
- compliance**  
11:19 14:16 16:4,  
25 23:6 32:16  
33:25 34:11 38:5,  
10 45:14 52:11  
53:21 58:10 63:3  
66:20 67:4 79:8  
83:17 87:3,12  
101:12 106:19  
115:7
- compliant** 41:11
- complicate** 83:19
- complicated**  
25:12 110:9
- complies** 28:23
- comply** 11:18  
25:10 52:2 71:22  
94:1
- component**  
40:19 41:12 49:17  
65:16
- components**  
40:19 42:3 49:9,  
10,12,23 50:22,25  
84:18,20 85:9
- comport** 53:25
- composed** 84:16
- compost** 36:21  
37:3,10 100:13,18  
101:14,17,20,22,  
25 102:11,25  
103:20 116:2,15,  
21,25 117:14  
122:2 124:22  
125:4
- compostability**  
110:13 123:13
- compostable**

- 17:25 32:16 33:25  
34:7,11 35:20  
37:4,9,24 38:5,7,  
20,22 100:17  
101:1,16 102:14,  
22 103:5,17,24  
104:1,10,16  
110:4,10 115:5,6  
116:12 117:8,18,  
19 121:23 122:5,  
14 123:16,18,22  
124:15 125:5,7,9
- compostables**  
35:13 36:22,24  
37:7,13,16,19  
104:17 110:13  
122:8
- compostables'**  
37:11
- composted**  
121:24
- composter** 37:2  
100:14
- composters** 37:8  
100:24 101:21  
102:8 103:7  
116:19 124:6  
125:1,8
- composting**  
37:13 100:22  
101:8,10 104:3,8
- comprehensive**  
39:18
- concept** 33:6  
53:19
- concepts** 8:12,13
- concern** 19:24  
20:3 26:25 58:20  
70:6 76:11 78:5  
84:19 94:4
- concerned** 19:11  
20:18 23:3 40:22  
55:13 56:2 66:13  
71:9 72:9 121:22  
122:2
- concerns** 22:14  
32:13 39:20
- 57:10,11 61:14,19  
69:6 74:8 83:2,6,  
10,12,21 87:17  
96:6 97:12 103:25  
106:7,20,22  
116:19 127:24
- conclude** 66:12  
127:11
- conclusion** 9:8  
119:7,8
- conditions** 104:8  
122:4 124:2
- conducted** 64:20  
65:1
- conducting** 28:4
- confidence**  
116:21
- confidently**  
51:12
- conflict** 96:11
- conflicting**  
103:12 114:20
- conflicts** 42:10  
53:19,22 106:13
- confuse** 45:9  
109:2 124:8
- confused** 102:23
- confusing** 124:4
- confusion** 57:7  
102:18,21 103:11  
115:1
- connected** 26:11
- consent** 45:8
- consequences**  
73:15
- Conservancy**  
39:17 67:11 74:13
- consideration**  
54:13 89:5 98:8  
117:8 124:6
- considered**  
16:20 25:1 40:7  
65:4 83:4 88:2,21
- 103:23
- consistent** 65:25  
91:25
- consistently**  
14:17
- constant** 65:23
- constantly** 99:10
- constituents**  
104:4
- constitute** 67:5
- constitutes**  
91:13
- construed** 59:11
- consult** 45:22  
71:13
- consultation**  
45:8 88:24 89:2
- consulted** 70:23
- consumer** 97:21  
102:21 116:21
- consumer-facing**  
87:2,13
- consumers**  
14:11 33:14  
78:19,24 83:9  
101:6 102:18  
109:2
- consumption**  
120:17
- contained** 25:21
- container** 49:13,  
15
- containers** 84:23  
85:8
- containment**  
36:19
- contaminants**  
117:4
- contaminate**  
104:3
- contaminated**  
64:1 80:16
- contamination**  
80:25 101:19,20,  
23 102:4,22,24  
103:3,6,10 109:3
- content** 49:3,4  
53:8 83:21 86:7  
91:10 104:9  
124:24
- context** 37:18  
84:10 114:1,11  
115:10
- continue** 21:6  
68:5 83:2,9 84:18  
85:3 87:1,10,17  
98:9 113:23 119:3  
127:5
- continued** 46:6,8  
50:18 58:25 83:22
- continues** 84:7  
88:5 96:14 116:13  
122:11
- continuing** 34:4  
87:6 88:7
- Contra** 59:5 93:3
- contract** 108:17
- contracts** 87:22
- contrary** 38:24  
43:25 45:10
- contrast** 63:8
- contribution**  
36:20
- control** 26:18  
50:9 77:6 79:10,  
24
- controls** 59:18
- conventional**  
32:22 33:18  
37:17,20 38:2,17,  
24 102:23 104:11  
117:2 124:11
- conversations**  
12:4 18:24 34:1  
36:24 78:20
- conversion**

- 122:18  
**convert** 20:1  
**coordinate**  
109:17  
**corporate** 32:7  
**corporations**  
23:22  
**cost** 25:18 36:8,14  
45:17,18 56:20  
58:22 59:14 60:21  
69:24,25 70:14  
77:18 78:19 91:21  
97:20,21,25  
101:25 102:19  
103:16  
**cost-covering**  
45:22  
**cost-effective**  
13:8  
**Costa** 59:5 93:3  
**costly** 101:2  
102:20  
**costs** 45:10,20  
50:12 59:20 60:9,  
16 64:15,16 78:23  
93:7,9 94:5,13,14  
95:8 98:3 102:3,  
21 103:1 114:3  
116:7  
**council** 52:22  
69:14 86:22  
109:8,10  
**count** 67:17 68:4  
77:24  
**counterproducti  
ve** 26:12  
**countries** 61:9  
67:3  
**country** 29:10  
37:8 68:11 123:24  
**county** 75:24 76:2  
78:6  
**couple** 6:10 19:10  
59:7 75:23 82:24  
84:17 89:8,23  
90:5 112:3 115:11  
**coupled** 120:13  
**court** 6:12  
**Coven** 11:7  
**cover** 52:24 98:1  
**coverage** 113:18  
**covered** 25:6  
26:4 28:20 40:18  
45:17 49:24 90:21  
96:4 97:1,8,23  
121:12 122:5  
**covering** 89:22  
**cracker** 64:7  
**craft** 25:1  
**Craig** 7:13  
**crazy** 121:2  
**create** 16:14  
19:16 38:21 41:21  
42:8 44:19 58:3  
68:14 70:14 76:8  
78:10 96:18 113:5  
**created** 14:10  
47:11 79:7 112:14  
116:22 121:2  
126:10  
**creates** 47:8  
103:9 112:14  
120:25 126:7  
**creating** 19:25  
20:19 55:24 72:23  
78:1 79:8 88:1  
**creation** 33:3  
34:21  
**creative** 117:25  
**credit** 49:3 86:7,  
12  
**creeks** 99:8  
**crises** 46:18  
**crisis** 99:19  
113:21  
**criteria** 45:17  
62:23 68:1,3,13  
69:2 84:13 88:20  
108:24 122:16  
**critical** 26:5 57:17  
74:17  
**critically** 56:4  
**crop** 117:4  
**crossing** 7:10  
**Cruz** 125:21  
**crystal** 59:12  
**Csilla** 6:6  
**culminating** 28:8  
**cumulative** 63:5  
66:17  
**Cunliffe** 27:5,6  
**cup** 77:23  
**curb** 116:4  
**curbside** 44:22  
76:3  
**curing** 124:24  
**curious** 10:16  
**current** 7:24  
15:14 16:12  
17:17,24 32:10  
38:23 47:5 56:4  
59:8 60:14,18  
77:14 94:25 97:9,  
24 107:2 112:16  
115:4 126:5,11  
**customer** 117:15  
**customers** 50:11  
95:9 103:1  
**cut** 114:23  
**cutting** 85:4  
**cycle** 21:24 22:7  
27:23 31:18 37:14  
64:25  
**cycles** 102:8  
**cynical** 38:6
- 
- D**
- 
- D6400** 101:24  
122:14  
**D6868** 122:14  
**D8618** 124:21  
**dad** 111:19 112:4  
**daily** 65:23  
**damage** 104:12  
**damaging** 30:20  
**Damiano** 46:12,  
13  
**dangerous** 123:6  
**Dara** 110:24  
**data** 69:7 78:22  
79:2 91:17,22  
92:7 93:25  
**data-gathering**  
92:7  
**date** 8:17 34:1  
50:21  
**dates** 107:9  
**David** 92:25 93:2  
**Davis** 98:20  
110:25 111:1  
**Dawn** 82:17 91:5  
**day** 46:3 71:17  
73:4 76:21 97:14  
100:20 120:15  
**days** 102:6,7,9  
107:13  
**de** 83:22 84:6,9,13  
91:6,14,18 92:2,4  
104:24,25  
**deadline** 50:23  
51:20 107:11  
**deal** 12:25 20:19  
**dealing** 55:6  
**dear** 66:23

- decades** 79:12  
82:11 100:25
- deceptive** 63:16
- decide** 91:13,18
- deciding** 23:19  
41:15 88:14
- decision** 52:7
- decision-making**  
52:1
- decisions** 19:3
- decompose**  
122:11,20
- dedicate** 57:24
- deep** 22:14
- deepest** 46:20
- deeply** 12:11  
32:9,20 35:22  
38:6 56:2 120:7
- Defense** 52:22
- defies** 18:2
- defined** 16:3 17:7  
104:17 108:11  
122:15,17 123:2
- defines** 84:12
- defining** 53:18  
123:1
- definition** 16:8,9,  
11 29:20,22  
49:11,18,23 53:1,  
3,23,24,25 54:6  
62:3,20 69:6 80:5,  
10 83:1,3,11,13  
87:7,16 104:19
- definitions** 30:1  
49:9 53:4 77:11  
123:2
- degradation**  
116:9
- degrade** 117:11
- degraded** 102:10
- deleted** 96:10  
106:17
- deliberate** 26:24
- delicate** 114:5
- delicately** 114:9
- deliver** 106:24
- delivered** 18:18,  
21 38:16 100:23  
108:12
- delivering** 11:19  
33:13 101:6
- demand** 19:23  
47:10 113:5 121:1  
126:9
- demands** 101:12
- dematerialization** 36:20
- demonstrate**  
58:15 90:9
- demonstrates**  
14:7
- demystifying**  
110:3
- denial** 88:22
- department** 11:8  
13:10 24:25  
26:19,25 27:3  
58:15 69:8 74:24  
79:9,23 85:1,5  
86:15,23 87:9,16  
88:18 95:22
- department's**  
26:3 68:18
- deployed** 62:5
- depolymerization** 62:12
- depths** 46:21
- deregulating**  
77:17
- des** 31:20,21
- deserve** 34:4
- design** 26:10  
84:22 85:23
- designated**  
105:15 109:11
- designation**  
108:20 110:13
- designations**  
107:23 108:22
- designed** 46:2  
49:22 102:24
- desirable** 36:18  
104:19
- desire** 100:17
- desired** 103:18
- detachable**  
84:18,20 85:9
- detail** 44:2 54:10  
61:17 64:23 67:8  
115:9
- detailed** 15:11  
21:1 45:3 50:13  
52:23 55:5 67:23  
89:22
- details** 25:6 48:24  
69:9
- determination**  
40:12,13,22 41:3,  
16 50:16
- determinations**  
41:2 86:20
- determine** 23:8  
51:6,10,12 86:8
- determining**  
86:12 123:13
- devalue** 102:11
- develop** 33:5  
41:22 68:13
- developed** 8:14
- developing** 26:24  
45:2 55:3
- Diego** 73:4
- diet** 14:2
- difference** 36:5  
101:3,4
- differences** 12:6,  
8,17 85:24,25
- differentiate**  
49:11
- differentiation**  
49:23
- difficult** 12:15  
41:22 51:6 98:4  
102:10
- difficulties** 85:2  
92:17
- dilemma** 115:4
- dilution** 64:2
- dinner** 35:7
- direct** 22:23
- directed** 7:7
- direction** 25:5  
42:9,16
- directly** 15:1  
68:17 96:10
- director** 11:5,7  
24:22 31:21 43:4  
59:5 67:11 69:13  
93:3 109:1
- disadvantaged**  
42:13 68:20 76:14
- disagreement**  
25:24
- disallows** 38:7
- disappointed**  
72:3
- disapprove**  
40:15
- disastrous** 46:17
- discarded** 112:18
- discarding** 20:13
- discrepancy**  
97:15
- discretion** 89:2
- discuss** 27:3

**discussed** 85:15**discussion** 51:14  
70:11**discussions**  
110:1**disintegrate**  
102:6**disintegration**  
122:16**disposable** 18:2  
56:1**disposables**  
17:19 102:23**disposal** 16:2  
20:16 53:3 62:8  
65:10**disposed** 102:19**disposition** 68:1**disproportionate**  
68:20**disruption** 50:12**disruptive** 106:14**distributed** 59:23**Distribution** 50:5**distributor** 50:6**diverse** 44:21**divert** 37:12 122:1**document** 51:14  
90:13**documents** 8:15  
109:25 110:5**dodge** 29:2**dollars** 101:11**domestic** 49:6**door** 7:4 17:18  
18:24 56:10 80:1  
81:16**double-dipping**  
94:13 95:5,6**doubling** 38:23**doubt** 16:15**downright**  
120:13**downside** 41:15**downstream**  
114:3**dozen** 15:7**dozens** 79:22**draft** 13:21 16:13  
18:20 28:14,21  
32:10 45:2 71:4,  
14 72:8 90:5 91:7  
98:9**drafted** 68:12  
90:11**drafters** 68:12**dragging** 76:18**drinking** 77:23**driving** 33:2  
71:19**drug** 43:24**drugs** 20:24 43:8,  
13,14,22 47:14  
85:13 112:25  
120:22 121:5,11  
126:13,20**dry** 36:7**DTSC** 80:9**due** 33:24 35:2  
66:2 79:24 98:3  
103:2 106:18**dump** 46:24  
111:10 125:24**dumped** 111:11**duplicate** 45:9,23**duration** 22:22  
86:2**Durlas** 50:3,4**Dylan** 104:25

---

**E**

---

**earlier** 21:20 28:9  
66:1 77:13 81:18  
106:11 107:21  
111:10 123:11  
124:1**earliest** 76:3  
106:1**early** 26:7**Earth** 48:18**easier** 25:9 94:6**easy** 41:25 49:15**eating** 113:10**echo** 61:19 74:7  
97:12 105:10**echoing** 106:10**economic** 36:2,6,  
8 86:22**economically**  
35:23**economy** 13:6  
48:13 69:15 70:15**Edgar** 100:12**Edgar's** 117:14**edge** 111:18,24**education** 18:13,  
14 58:7 97:21  
103:11**effect** 38:22 55:23  
68:16 107:12**effective** 9:4 36:1  
57:6 107:7**effectively** 12:12,  
23 64:8 98:23**effects** 46:18  
76:16 109:13**effectuate** 74:17**efficacy** 120:24**efficient** 95:3**efficiently** 12:23**effort** 12:25 23:24  
28:7 45:1 75:5  
116:4**efforts** 13:4 26:6,  
13**egregious** 15:21**EJ** 27:14,19 28:16  
30:9 31:2 127:25**EJCAP** 21:17  
27:9 29:25 127:16**elements** 25:8**elevators** 7:1**eligibility** 104:16**eligible** 14:14  
25:18**eliminate** 40:10**email** 17:3**embracing** 66:9**emerged** 12:3**emerging** 104:1,7**Emerson** 46:10,  
12**Emily** 11:7**emissions** 66:4,6  
126:2,3**emitter** 66:3**Emma** 8:5 92:15  
98:12,18**emphasis** 62:24**encourage** 12:16  
14:13 51:24 57:22  
67:19 68:6 69:1,  
10 109:15**encouraging**  
68:24**end** 9:24 12:16  
23:2 30:20 31:6,9  
39:10 48:24  
62:20,23 64:20  
66:17 77:20 78:4

- 85:4 88:2 99:4  
101:7 104:17  
108:10 109:5,11,  
14,16 111:14  
113:24 114:6  
116:15 117:1,15,  
17,19 119:17  
121:21,23 122:3,  
7,9 124:16
- endeavor** 7:2
- endocrine-  
disrupting** 27:25
- ends** 9:8 31:11
- enemy** 37:1
- energy** 76:9
- energy-intensive**  
99:20
- enforce** 94:18  
95:4
- enforced** 102:16
- enforcement**  
52:10 55:7 58:6  
97:13,16 102:13  
110:1
- engage** 11:23
- engagement**  
28:5,11 50:19  
58:25
- engaging** 22:15  
61:12
- engineering**  
34:13
- enormous** 91:20
- enshrined** 125:11
- ensure** 9:10 13:12  
14:3,17 25:20  
32:14 33:13 42:11  
57:12,17 59:18  
60:1,23 68:19  
71:14 73:21 75:4  
87:12 88:3,23  
121:10 124:14,17  
125:4
- ensuring** 12:12
- 13:23 19:7
- entails** 87:14
- enter** 41:16
- entire** 18:3 20:23  
22:22 24:16 40:4  
49:15 59:13 98:25
- entities** 52:1  
87:12
- entity** 41:8
- entity's** 41:3
- entrees** 32:2
- entrenching**  
32:21
- environment**  
20:14 24:16 36:19  
37:21 38:1 44:13  
47:9,15 58:23  
64:21 67:6 72:13,  
15 75:17 99:11  
111:9 112:10,15,  
19 120:6,7,10,25  
121:7 126:8,15
- environmental**  
8:3 20:15 21:17,  
21,22 27:7,10,21  
31:8,15 36:1,6,7,  
14 44:20 46:18  
55:10 57:17 61:20  
62:25 63:4 66:14,  
24 67:3,21,22  
73:3,6,15 74:1,8  
75:12,13,15  
76:13,19 77:1,4  
79:15,19,22 80:2,  
20,23,24 81:20  
82:9,13 86:16,22  
95:22 97:3 101:11  
104:12 115:25  
116:9 127:15
- environments**  
46:23
- envisioned** 40:9  
56:17
- EPA** 65:15,18
- EPR** 11:18 51:7  
93:17 95:1 97:16
- 125:2
- EQ** 109:7,17
- equitable** 55:24
- equivalent** 46:23  
125:24 126:3
- errand** 36:11
- essence** 60:13
- essential** 33:14  
50:6 63:18
- essentially** 68:3
- establish** 13:13
- established**  
57:20
- establishments**  
113:10
- estimate** 96:23
- estimated** 56:22  
65:15,18
- estimates** 96:22
- evacuate** 6:25
- evacuation** 6:21
- Evacuees** 7:5
- evaluate** 40:15  
110:13
- evaluating**  
124:22
- evaluation** 41:1,4
- evening** 11:10
- event** 6:24
- events** 18:25
- everyone's** 9:11
- evidence** 63:14  
64:15,23 104:7
- exacerbate** 115:4
- exacerbates**  
53:22
- exact** 78:12 80:8
- examples** 51:25  
52:6
- exception** 88:15
- excess** 90:24
- exclude** 29:1  
43:19,24 47:13  
54:7 126:12
- excluded** 20:25  
43:10,15 55:18  
96:9 97:9
- excludes** 56:18
- exclusion** 16:22  
20:25 40:7,13,22  
41:8 42:8 43:12  
45:13 72:1 77:14  
85:13,14,18  
106:12
- exclusions** 14:15  
16:12,17,18 20:18  
21:2 28:19 39:25  
43:8 47:19 55:14  
57:6 70:16 77:12  
96:17 97:2 99:23  
107:4,14 112:24  
120:21 121:4  
126:19
- excuse** 37:5  
122:6
- executive** 11:7  
59:5 93:3
- exempt** 17:9 71:4
- exempted** 43:10  
72:1 85:16 113:2
- exemption** 10:13  
16:21 25:7 45:15  
47:21 53:21 86:2,  
3 90:7,8 91:6,17  
92:3 106:18 113:1  
126:21
- exemptions**  
14:15 28:21 29:15  
34:22 71:14 86:6  
88:9 90:1 96:15,  
16 112:17
- exercise** 7:10  
92:7
- existence** 98:3

- existing** 34:24  
45:15 70:13  
102:14 104:15  
123:5
- exit** 6:23 7:2,3,4,5
- exits** 6:23
- expand** 116:2  
117:18
- expanded** 55:8  
58:5,21
- expanding** 96:13
- expands** 96:8
- expenses** 25:20  
60:12
- expensive** 56:23
- experience** 70:21  
71:2 90:18 99:3,  
12 100:25
- expertise** 14:9
- experts** 70:24  
71:14
- explain** 62:16
- explicit** 42:14,15
- explicitly** 24:1  
38:19 42:8,11
- exploited** 123:7
- exponential**  
34:20
- exponentially**  
12:14
- exports** 66:25
- exposed** 65:19  
99:10
- exposure** 65:16,  
22,23
- express** 22:14  
24:21
- expressly** 60:15,  
19
- extend** 89:3
- extended** 13:14  
114:2 116:6
- extension** 88:15
- extensions** 88:10
- extensive** 96:5
- extent** 46:22
- extremely** 48:20  
98:4
- eyesore** 88:16
- 
- F**
- 
- face** 29:6,10 41:10  
45:14 51:3 63:20  
73:3 113:23  
114:24,25 115:4
- faces** 113:21  
114:24
- facilities** 10:15  
15:23 19:21 22:12  
23:18 66:18,22  
69:8 73:1 79:11,  
25 81:5 88:1  
101:8,10 122:3  
124:17
- facility** 65:8,11,  
18,20,23 76:5  
79:7
- facility-level** 54:3
- fact** 16:19,24  
33:23 40:6,21  
46:23 52:25 59:25  
80:8,11 100:17  
111:4
- factor** 75:5
- factors** 26:18
- fail** 37:23 55:19  
68:5 117:10
- failed** 38:23
- failing** 20:10  
35:10 38:21 63:4  
67:19
- fails** 63:3 73:19
- failure** 34:19  
96:11
- fair** 105:10
- faith** 46:4 72:5
- fake** 17:15
- fall** 50:25
- fallacy** 35:25
- falling** 90:5
- falls** 60:5
- false** 29:23 58:21  
72:21 99:18
- families** 28:2  
73:14
- family** 62:13  
64:11 73:11  
111:17 115:21,23
- family-owned**  
32:4
- family-scale**  
115:24
- FAQS** 58:3 87:11
- far-reaching**  
109:12
- farm** 117:4
- farmers** 103:19  
115:21,23 116:19
- farmers'** 117:8
- Farnoush** 110:18,  
22,24
- FDA** 14:7 17:10  
20:18 28:23 77:15  
99:23
- FDA's** 85:17
- fear** 21:5 123:7  
124:4
- Fearing** 39:14,15  
115:17,20
- feasible** 51:23  
96:20
- federal** 10:16  
14:3,6 16:9,24  
41:24 42:10 45:14  
53:23 63:7 77:12,  
16 80:5,7,10,13  
106:13
- Feds** 41:25
- fee** 86:14,18,20
- feedback** 8:12
- feeding** 24:7 64:5
- feel** 15:14 78:7  
81:16 85:4 90:4  
91:24 105:14  
106:21 107:20  
118:3
- feels** 15:9 122:21
- Feldman** 59:4
- Felix** 125:19,20
- felt** 30:10 112:7
- fewer** 55:22,25
- fiber** 34:17 100:20  
103:5 123:12
- fiber-based**  
33:11 83:18  
122:23 123:16,17
- fiber-only** 34:10,  
25
- fibers** 36:7
- field** 68:14 70:25  
81:8 124:21
- fight** 23:20,21
- file** 8:25 9:2 10:23  
88:19 107:14
- filed** 63:13
- fill** 21:6
- filled** 99:12
- film** 33:12 35:14,  
24 36:8 108:4
- films** 35:16 36:15
- final** 7:21 8:22,23,  
24 10:21 65:10  
73:21 75:4 76:21  
85:14,19 88:17

- 100:7,8 105:17  
115:15 117:23  
118:24 119:10
- finalization**  
105:25
- finalize** 109:6,18
- finalized** 12:15  
54:15 105:25
- finalizing** 31:13  
71:12 99:14
- finally** 14:19 16:8  
26:15 30:12 36:22  
37:16 45:25 55:23  
58:2,14 62:22  
66:12,23 86:21  
88:9
- financial** 13:1  
36:9,13 71:16  
96:2 97:7
- financially** 60:4,  
24
- find** 7:3 12:5 51:2
- fine** 97:14
- fines** 46:3 70:1
- finish** 33:22
- finished** 102:9  
122:7 125:4
- Fiona** 18:12
- fire** 6:24
- firm** 28:7
- fits** 62:2
- fix** 31:10 92:19  
118:12
- flake** 88:1,7
- flawed** 32:21
- flaws** 15:13
- fledgling** 25:17
- flexibility** 25:15  
86:1,13
- flexible** 35:15
- flexibles** 108:5
- floating** 111:24
- flow** 90:22
- flows** 90:13
- focus** 12:22  
39:20,24 50:14  
56:6 58:20 67:12  
108:3 111:3  
121:20
- focused** 74:10  
85:7 87:4 106:8
- focusing** 37:4,5  
114:14
- folks** 29:11 84:1  
94:12 106:22
- follow** 9:12 50:13  
52:14 69:9 70:7  
125:15
- food** 13:23 14:1  
17:11 20:23 29:1,  
10,13 33:10,13  
34:14,17,18,20  
35:15,16,24 36:16  
37:12 40:10 43:8  
47:13 50:11 55:8  
58:5 70:24 71:3,5,  
13 83:1,4,5,6  
100:19 101:6,15  
103:4,15 112:25  
115:6 116:5,10,16  
120:22 121:5,11  
124:10 126:12,20
- food-associated**  
36:16 103:13
- foods** 29:8,10  
35:7
- fool's** 36:11
- footprint** 65:2,3,5  
66:2
- force** 33:2
- forcing** 38:9
- foremost** 106:10
- foresight** 14:8
- Forest** 89:16
- forests** 99:7
- form** 23:8 30:17  
38:14 56:15
- formal** 8:14 40:1
- formats** 35:8 36:7
- formed** 79:22
- fortunate** 11:23
- forward** 13:10  
24:10 25:15 46:8  
58:25 61:2 98:8  
109:7 125:15
- forwards** 31:14
- fossil** 32:18 34:22  
37:14,17 38:17
- fossil-plastic**  
33:18
- foster** 25:16
- found** 46:20 66:4  
71:5 102:15 103:7
- foundation** 14:22  
54:25 61:22
- Foundation's**  
54:20
- foundational**  
14:1
- founding** 79:18
- Fourth** 45:21
- fragility** 114:7
- framework** 14:11  
46:7 116:5,6
- frameworks**  
125:13
- franchise** 44:24  
87:19,21 94:18,  
23,25 95:2
- frankly** 72:2
- free** 23:9 32:19  
116:16
- frequently** 87:11  
117:10
- fresh** 14:4
- front** 22:6 39:21
- fronts** 114:12
- frozen** 32:2 33:6,  
10 35:7
- FSMA** 71:2
- fuel** 78:10
- fuels** 37:14 76:9
- full** 27:2 105:8
- fully** 101:3 117:10  
121:12 122:23
- function** 36:1  
101:18 104:13
- functional** 34:12,  
15 35:9,21 38:7  
100:22 101:6,7
- functionality**  
34:9,23 35:3
- fund** 18:14 31:3  
57:25
- fundamental**  
59:11,18 60:2,3,  
23 74:21
- funded** 25:21
- funding** 55:25  
57:12 58:1 94:3,6  
95:7 125:2
- funds** 24:5 31:4,7  
55:7 57:11,14,21  
59:23 60:7,10,20
- future** 32:19  
35:19 58:18 99:9  
105:22
- 
- G**
- 
- GAIA's** 66:24
- gain** 10:13 33:8
- Garcia** 74:5
- Garibay** 74:5
- Gary** 70:18

- gas** 66:1 126:2
- gases** 67:21  
80:24
- gasification**  
62:12 64:11 81:5
- gave** 77:21
- general** 31:12  
63:13,16 81:22
- generally** 51:3
- generate** 15:23  
31:4 67:16 104:10
- generated** 63:2  
69:4
- generates** 24:4
- generation** 16:1,  
2 56:8 63:1 67:20,  
21 74:9
- genuine** 30:7  
63:20
- give** 22:21 53:7  
63:4 68:16
- giving** 9:14 12:17  
15:3 77:12
- gladly** 78:2
- glass** 24:19
- glasses** 112:8
- global** 51:9 61:7,8  
66:25
- goal** 12:4 13:5  
33:16 74:10 98:24  
105:17
- goals** 26:1 39:23  
71:15 95:25
- good** 6:5 7:12  
10:6,9 13:17 15:4  
24:12 27:5 36:25  
37:1 44:11 46:4  
47:24 50:3 54:19  
59:4 65:12 69:12  
72:12 82:15 83:5  
95:20 100:12  
108:2,3 110:18,  
19,24 118:21
- 119:2
- governed** 16:10
- government** 19:5  
77:12,16 80:7
- governments**  
11:20,25 44:18  
69:24 70:1 93:7,  
10
- governor's** 91:25
- grace** 52:11
- granola** 35:7
- granted** 21:3 49:4  
86:5
- grassroots** 61:9
- grateful** 25:5
- gratitude** 24:21
- grease** 33:11  
34:16
- great** 12:25 98:17  
99:2 115:17  
118:15 120:1,4
- greater** 86:12  
107:22
- greatly** 20:12  
37:18
- green** 103:14
- greenhouse** 66:1  
67:21 80:24
- greenwashing**  
53:10
- Gregory** 24:13
- grew** 73:4
- Grill** 13:17
- groundbreaking**  
47:1
- Groundhog**  
71:16
- group** 18:13,15  
70:18 99:1 125:23
- groups** 61:9  
67:14 77:1 79:21
- growers** 116:1  
117:2
- growing** 26:6  
120:8
- growth** 26:19  
62:9 116:4 117:12
- guess** 15:15  
80:17 82:16
- guidance** 50:21  
51:18 52:1,6 53:5  
86:24 87:11 91:8  
92:3 109:25 110:5
- guideline** 17:2,5
- guidelines** 17:1  
41:24 42:1
- guides** 84:22
- guys** 10:17  
110:22
- 
- H**
- 
- HACCP** 71:3
- Haley** 24:13
- half** 111:12
- HAMILTON** 21:15  
127:12
- hand** 9:22 10:3  
39:7 42:10 44:10  
59:3 92:23 95:16  
112:4 119:14  
125:18 127:3
- hands** 42:23 44:6  
89:8 92:11,21  
119:22,23 126:24  
127:6
- hang** 73:9
- happen** 21:7,8  
23:12,13 81:9  
93:13 105:20  
109:9
- happened** 79:16  
93:19
- happening** 58:11
- happy** 27:2
- harbor** 52:8
- hard** 55:3 69:17  
100:1 105:5
- harder** 55:21 57:4
- harm** 22:21 24:2  
47:9 62:24 64:19  
66:21 82:11  
112:15 117:11  
120:25 121:1  
126:8
- harmed** 31:17
- harmful** 19:20,25  
23:10 47:6 104:2  
126:6
- harmonized**  
11:19
- harms** 22:21 24:5,  
6 30:23,24 31:5  
73:17
- haulers** 12:1
- hazard** 86:16
- hazardous** 15:19,  
24 16:7,8,11  
19:16 53:18,23  
54:5 56:8,11,19  
63:1,2 65:7,11  
67:17,20 68:2,4  
69:3,4,6 74:9  
79:6,8,11,14,25  
80:2,5,11,12,15,  
23 82:12
- HDPE** 38:3
- head** 112:1,5
- headed** 32:14  
78:8
- headsets** 6:17
- health** 13:23  
18:17 20:11,15  
27:24,25 30:20,23  
31:1,2 46:17  
47:10 64:22 67:5,  
23 74:1 76:16  
77:18 86:16 97:3  
106:19 112:15

- 116:8 117:12  
120:13 126:9
- healthier** 27:20  
100:3
- healthy** 36:20  
116:1
- hear** 10:7,8,17  
12:7 15:2 95:18,  
19 110:19,23  
120:2,3 127:21
- heard** 18:5 19:1  
56:25 61:14,24  
63:11 67:14 118:3  
123:11 127:12
- hearing** 6:7,11,  
13,14 7:14,20 8:2,  
18,20 9:8,12  
10:19 63:9 84:2  
118:23 119:4,6,8  
127:10
- heart** 66:24
- heatwaves** 73:8
- heed** 21:9
- Heidi** 69:13
- held** 8:11 59:19  
123:24
- Heller** 24:22
- Helm** 75:10
- helpful** 52:5 86:13
- helping** 11:18  
14:3 37:11 57:24
- hierarchies** 25:8
- hierarchy** 87:7
- high** 27:25 29:6  
40:17,24 82:24  
113:15
- high-quality**  
37:10 116:2
- higher** 102:21
- highest** 101:13  
125:8
- highlight** 13:2
- 15:12 17:13 34:2,  
4 35:13 45:5  
61:16 89:24 93:15  
96:5 97:18 106:6
- highlighted**  
106:23
- highly** 41:5 64:1  
95:25 106:14
- highly-processed** 29:7
- hikes** 112:2
- hiking** 111:18
- hinder** 13:3 26:1,  
13
- Hines** 18:12
- hinges** 117:2
- historically** 24:3
- history** 43:14,20  
54:9
- hold** 46:2 57:22  
73:21 125:7
- holding** 33:23  
109:25
- home** 33:21 48:17  
73:13
- honor** 90:3
- honored** 11:13  
54:23
- hook** 82:2
- hope** 54:13 72:7  
110:6
- hoping** 71:11
- horrible** 112:7
- host** 9:22 39:8  
60:22 119:14  
127:3
- hour** 99:6 115:16
- hours** 24:23 61:19
- households**  
44:23
- huge** 48:21 55:2
- human** 27:18 67:5  
77:18
- humans** 46:21
- humility** 14:8  
35:4
- hundreds** 99:6  
100:19
- hurts** 76:19
- 
- I**
- 
- icon** 6:19
- idea** 34:10
- ideally** 36:20
- identify** 6:22  
83:20 107:15,18
- identifying** 25:6  
114:18
- ignore** 34:4 37:6  
62:23
- ill-defined** 17:2
- illegal** 43:7 60:6,  
15,19
- illness** 30:24
- imagined** 120:9
- immediately**  
105:25 107:7
- impact** 22:4,7  
23:10 27:24 41:14  
42:13 46:22 87:18  
103:7 120:12
- impacted** 21:24  
24:2 109:21
- impactful** 13:8
- impacting** 109:13
- impacts** 20:15  
22:11,13 23:10  
24:5 26:22 62:19  
63:5 66:17 67:22,  
23 68:6,20 80:23  
97:4 101:19
- 105:13 116:8,20
- impair** 101:17
- impairment**  
104:12
- impermissibly**  
53:2
- implement** 12:22  
26:20 42:12 53:6  
57:5 96:12 97:20  
120:21
- implementation**  
13:12 14:23 26:1  
50:20 55:7 57:19  
105:16 106:14  
109:24
- implemented**  
19:7 72:7 96:24  
98:23 105:14  
108:7 116:13
- implementing**  
12:12 31:14 43:21  
59:14
- importance** 64:9
- important** 17:11  
25:15 27:16 29:13  
30:6 39:22 84:8  
85:14,18 86:13  
87:21 90:2,3,7  
91:5 93:13 116:23  
122:25 124:6
- importantly**  
89:17,20
- imports** 48:20
- impose** 46:3
- impossibility**  
35:5
- impossible** 41:22  
51:6,10
- improve** 50:11  
73:19
- improved** 25:4
- Improvement**  
22:2 75:11,15  
79:18

<b>improvements</b> 60:10,23	<b>including</b> 11:24 20:3 24:19 28:6 30:23 34:16,18 35:2,15 52:25 53:17 67:1 69:6, 17 76:6 101:23 123:25	<b>inflict</b> 117:19	43:21 44:16 45:10 53:15,20 59:14 60:2,3,24 71:7 72:22 73:20 74:17 75:8 81:7 88:19 91:25 93:6,8 97:6
<b>in-markets</b> 87:23, 24	<b>inclusion</b> 41:24 44:3 85:12	<b>influence</b> 50:10 79:3	<b>intention</b> 87:20 97:16
<b>in-person</b> 39:13 42:25 44:8 61:4 92:13 100:8 115:14,15	<b>incongruent</b> 41:6	<b>informal</b> 51:15 109:25 110:5	<b>intentionally</b> 16:22 68:12
<b>in-state</b> 51:22	<b>incongruity</b> 42:7	<b>information</b> 26:5 51:4 54:3 58:4,12	<b>interest</b> 18:13,15
<b>in-the-state</b> 50:15	<b>inconsistent</b> 53:14 62:19	<b>informs</b> 28:11	<b>interest-holders</b> 11:24
<b>inadequate</b> 60:1	<b>increase</b> 34:20 58:20 98:2 109:3	<b>infrastructure</b> 30:7 42:12 48:5,7	<b>interested</b> 12:10 23:1 109:22
<b>inappropriate</b> 16:19	<b>increased</b> 45:17 60:22 102:2	<b>Infrequent</b> 54:3	<b>interim</b> 110:1
<b>inappropriately</b> 54:2	<b>increases</b> 103:15	<b>initial</b> 106:15	<b>intern</b> 72:14
<b>inaudible</b> 96:21 97:10 98:6	<b>increasing</b> 38:11 102:3,25 103:10	<b>initially</b> 107:13	<b>interpret</b> 52:2
<b>incentive</b> 76:10 78:7	<b>incredible</b> 105:5	<b>initiative</b> 54:21 74:23	<b>interpretation</b> 6:14,17,18
<b>incentives</b> 55:25	<b>incredibly</b> 46:16 83:14 98:4 113:15 114:5	<b>injustices</b> 73:3	<b>interpretations</b> 114:20
<b>incentivize</b> 116:10	<b>incrementalism</b> 32:7	<b>innovative</b> 34:6 35:19 108:5	<b>interpretive</b> 51:18 52:6
<b>incidence</b> 27:25	<b>incumbent</b> 32:21	<b>input</b> 25:1	<b>intertwined</b> 120:10
<b>incinerates</b> 112:12	<b>incurred</b> 97:20,25	<b>insecurity</b> 29:10	<b>introducing</b> 117:3
<b>incineration</b> 30:17 47:8 61:25 62:2,3 63:7 72:24 126:7	<b>individual</b> 90:12 121:22	<b>inside</b> 7:8	<b>invested</b> 45:19 101:11
<b>incinerator</b> 22:9, 10 61:7 78:6	<b>industries</b> 78:1 79:3,13	<b>insights</b> 34:2	<b>investigation</b> 65:12
<b>incinerators</b> 22:8 75:20 76:1 79:17 80:19 81:6	<b>industry</b> 14:14 19:4 33:8 63:9 70:20 75:19 77:6 78:11 81:3 82:2 85:6 90:2,8,18 106:23 116:24 126:1	<b>insist</b> 64:9	<b>investigative</b> 65:14
<b>include</b> 48:7 54:6 63:11 70:11 75:4 108:16	<b>ineffective</b> 55:16	<b>Inspection</b> 10:16	<b>investing</b> 48:7
<b>included</b> 41:23 82:22 85:17 108:16	<b>ineffectively</b> 32:20	<b>institute</b> 24:15 47:21 113:1 121:18 126:21	<b>investment</b> 13:1 26:6 101:5
<b>includes</b> 21:25 60:3 83:14 97:21	<b>inefficient</b> 41:17	<b>insufficient</b> 67:4	<b>investments</b> 49:6
		<b>intact</b> 59:19	<b>invite</b> 9:9 126:25
		<b>Integrated</b> 59:5	<b>involved</b> 24:23 30:18
		<b>integrity</b> 60:2 74:14 116:21	
		<b>intended</b> 34:8 37:22 88:25 96:24 97:8 99:25	
		<b>intent</b> 20:12,20 32:15 33:5 38:24	

**ironic** 24:4**ISO** 54:2 68:7  
80:21**issue** 19:4 35:2  
48:23 49:8 51:9  
53:12 65:7 77:10  
86:20 87:15  
114:15 118:8  
127:23**issued** 17:3 91:8**issues** 18:16  
25:25 27:2,20  
32:10 45:14 52:24  
53:16 68:8 79:23  
89:23 115:11**item** 40:11 41:10**items** 35:25  
121:23 122:23  
123:17,18,19

---

**J**

---

**Jan** 105:18**January** 11:14  
58:16 74:21**Jennifer** 39:15  
115:20**jeopardize** 117:4**job** 101:21**join** 39:3**joining** 6:6 8:7  
119:5**Jose** 95:23**journey** 32:12,25  
33:20 113:15**jump** 64:14**June** 96:22**jurisdiction**  
12:18 98:1 108:17**jurisdictional**  
51:11 107:25**jurisdictions**45:6,18,22,25  
59:11,16,21,23  
60:4,8,11,17  
88:10,12,25 94:7,  
15,18,20 95:11  
96:3 97:14,17,19  
98:5 100:25**justice** 21:17,21,  
22 27:7,10,18  
31:15 55:10 57:17  
61:20 63:4 66:14,  
24 67:22 74:1,8  
75:12,13,16,17  
76:13,20 77:1,5  
79:15,19,22 80:2,  
20,23 81:20 82:9,  
13 127:15

---

**K**

---

**Karla** 74:5**keenly** 30:10**keeping** 60:4,24  
85:7 116:16**key** 20:12 34:2  
45:5 53:4**kid** 120:8**kids** 99:9**kind** 15:9 17:5,6  
21:19 24:4,5,8  
29:20,22 76:24  
84:25 87:20  
117:16 118:4,12  
121:2 127:17**kinds** 29:2,14  
49:17 73:17  
117:20 123:20**Kitchen** 31:22**knew** 118:4**knowable** 90:18**Koepke** 82:15,17  
84:4 85:3**Krista** 50:1,4**Krueger** 93:2**Kustic** 47:24

---

**L**

---

**LA** 27:19 44:13**lab** 101:23 122:19**labeled** 102:18  
104:16**labeling** 85:23  
102:12,13 110:3  
123:5 125:10**labels** 49:16**laboratory** 124:1**lack** 34:15 35:3  
69:7 83:3 84:21  
87:6 102:12**lacking** 93:13,16**laid** 16:16 41:7**lake** 111:17,18,22,  
24 112:6**lakes** 99:8**laminates** 35:16**land** 12:11**landfills** 21:6  
80:14,17,18  
112:18 113:4  
121:6 126:15**Lane** 117:24**language** 6:20  
8:12,14 16:24  
19:14 28:24 29:21  
43:13,19 48:25  
53:13,17,20 54:9  
56:11 67:2 68:13  
71:4 74:16 77:20  
78:2,14,18,19,21  
85:9 86:15 88:4  
90:4 93:13 98:5  
104:15 108:19  
121:21 122:8**lap** 112:5**large** 29:1 50:6  
64:2 65:5 76:11  
96:25 102:16

103:4

**largely** 87:4  
104:14**largest** 31:25  
44:21 101:25  
117:1**LASAN** 44:21**lastly** 42:5 104:18  
109:20 110:8  
115:3**late** 91:8**latest** 18:20**Latino** 75:24**laughable** 34:12**launch** 12:19**law** 7:16 8:24 9:1,  
3 12:5 14:6 16:10  
19:6,7 20:9,12,20,  
22 21:5 24:4  
32:22 38:25 41:6  
42:10,12,17  
43:23,25 53:2,14,  
22,25 55:16 60:3,  
24 63:7,8,19 69:4,  
23 70:4,7,9,12,17  
71:7 74:18 80:13  
81:21 94:16 97:16  
99:24 105:13,21  
110:10 122:15  
123:5,15 124:12  
125:11,15**laws** 11:18 23:7  
43:5 80:6**lawsuit** 63:13**lax** 80:3**layers** 33:18**Layla** 72:13**leaches** 116:17**lead** 32:18 34:19  
44:20 104:25  
105:12 113:3**leader** 13:13  
21:11 72:20

- leadership** 46:6  
50:17
- leading** 32:24  
59:8 102:21,24  
103:14
- leakage** 36:19
- learn** 111:8
- learned** 101:2
- leave** 29:22
- leaves** 41:5 47:15
- leaving** 32:15  
84:23 117:11
- led** 78:23
- left** 71:23 98:6  
121:7 126:15
- legal** 8:5,7 17:7
- legislation** 16:25  
47:1,3 90:1 91:1,  
12
- legislative** 43:14,  
20 53:15 54:9  
57:15 90:3 113:13
- legislature** 16:16  
91:3
- leniency** 52:11
- lessening** 77:17  
96:2
- lessons** 101:2
- let alone** 68:11
- lets** 82:2
- letter** 15:11 46:7  
55:5 64:24 105:8  
110:15
- level** 68:14 70:16  
86:19 103:7
- lieu** 52:8
- life** 21:24 22:7  
27:23 31:18 33:13  
37:14 64:25 99:1  
101:7
- lifestyles** 112:10
- lifetime** 65:15,20,  
22
- Ligare** 54:19,20
- lightly** 105:19
- likelihood** 108:23
- limit** 9:15 20:21  
26:3 100:2,17  
120:16
- limitation** 28:18  
29:16
- limitations** 14:9  
27:15 28:14 115:5
- limited** 26:12  
53:11 106:18  
107:4
- limiting** 98:24
- limits** 15:18
- lined** 10:4 11:1  
119:20
- lines** 65:9
- lining** 33:11
- linked** 30:23
- list** 26:4,5,9 52:4  
88:13
- listed** 123:2
- listened** 24:25
- listening** 95:12
- lists** 16:25
- literally** 47:7  
79:12,22
- literature** 65:4
- litigation** 71:21
- litigious** 14:11
- litter** 21:6
- live** 65:22 68:22  
98:19 125:21
- lived** 73:14
- lives** 35:11
- load** 114:23
- loads** 120:15
- lobbying** 42:1
- local** 11:25 44:18  
45:6,22,25 59:11,  
15,20,22 60:4,8,  
11,17 69:24 70:1  
80:14 88:10,11,25  
93:7,10 94:7,17,  
19 95:10 96:3  
97:13,17,19  
107:25 108:9,15,  
16,17
- locally** 48:16
- located** 66:18
- location** 51:4  
66:22
- locations** 23:19
- locking** 38:23
- long** 22:9 73:14
- long-lasting**  
22:13
- long-standing**  
31:8
- long-term** 22:21  
33:16 51:5
- longer** 86:4
- looked** 16:1,2  
17:22 111:21
- loop** 24:8
- loophole** 55:14  
81:3 123:6
- loopholes** 16:14  
20:19 72:21 81:9
- Los** 21:16 44:13,  
16 46:14 127:14
- losing** 72:5
- loss** 48:21
- lost** 103:11
- lot** 18:4 22:5 42:3  
66:25 71:21 83:21  
90:18 106:10  
112:16,17 127:22
- lots** 94:21
- loudest** 37:2
- lovely** 111:20
- low** 41:23 48:20  
73:9 83:25
- low-education**  
75:21
- low-income** 29:5  
30:4 68:21 73:1  
75:20
- low-yield** 64:1
- lower** 78:23
- lowering** 57:8
- lucky** 99:11
- lunch** 89:10,14  
92:13 114:13  
118:17,19
- 
- M**
- 
- made** 6:10 20:8  
21:20 22:19 26:2  
29:15 33:1 40:13  
49:6 53:9 55:9  
57:18 65:17  
69:20,22 71:17  
76:23 77:2,14  
87:25 106:8 112:9  
123:12,20
- magnitude** 37:20  
66:5
- main** 48:1 55:5  
61:13 62:4
- maintain** 74:14  
85:14 88:7
- maintained** 60:3,  
25 85:19
- maintaining** 69:1  
85:21 86:3
- major** 17:15 20:2,  
19 27:22 66:3  
77:4 79:23
- majority** 35:1

**make** 9:20,21  
 10:10 19:17 23:24  
 25:9 26:13 32:1  
 39:5,7 40:21  
 41:15,21 49:21  
 51:22 55:15 57:4  
 61:16,24 62:10,22  
 64:7 72:19 73:17  
 89:12 93:13 94:10  
 95:6 101:1  
 105:13,21 107:6,8  
 109:1 119:12,13  
 126:25 127:2,7  
**makes** 51:5 66:10  
 76:5 124:13  
**making** 9:12 12:5  
 22:16 26:8 31:11  
 60:2 61:17 62:17  
 66:8 78:16 80:8  
 81:23 101:5  
 108:9,14 116:25  
**malice** 86:14,18,  
 20  
**manage** 101:8  
**managed** 36:17  
 68:4  
**management**  
 36:18 53:19 56:6  
 59:6 68:2 79:25  
 80:16  
**manager** 8:3 27:7  
 54:20  
**managing** 44:17  
 63:1  
**mandate** 74:15  
 75:6 110:4  
**mandates** 97:11  
 110:2  
**manner** 57:6  
**mantra** 36:12  
 70:15  
**manufacture**  
 101:13  
**manufacturer**  
 83:7

**manufacturers**  
 50:8 82:19 89:18  
 100:18 101:4,5,17  
**manufacturing**  
 30:16 88:8 101:20  
**Marcus** 8:3  
**marginal** 36:18  
**marginally** 35:23  
**margins** 32:20  
**market** 23:2 26:21  
 33:15 36:11  
 62:20,23 64:20  
 78:4 102:9 109:11  
 116:15 117:1,17,  
 20 121:21,24  
 122:8,9 124:4,8,  
 16  
**market-based**  
 14:15  
**marketability**  
 103:2  
**marketed** 62:14  
 101:16  
**marketing** 33:9  
 102:5  
**marketplace**  
 106:25  
**markets** 12:1  
 48:11 66:17 88:2  
 101:13 104:17  
 108:11 109:5,14,  
 16 116:2 122:3  
**marks** 62:7  
**mass** 94:22  
**mass-produced**  
 77:24  
**massive** 20:20  
**material** 24:17,19  
 26:4 32:6 37:15,  
 24 40:18 41:12  
 49:24 64:20 74:20  
 75:1 88:1,13 90:8,  
 21 103:2 117:1  
 123:20,23 124:18  
 125:14  
**materially** 35:11  
 38:15  
**materials** 25:6  
 26:14 28:20 35:15  
 36:15,18 48:11  
 50:22,25 53:1  
 55:18 83:18 84:16  
 96:4,19 97:23  
 100:21 102:5  
 103:4 108:10  
 116:11  
**Matt** 113:8  
**matter** 34:10  
**mattress** 93:20  
**mature** 122:6  
 125:4  
**Mchugh** 82:17  
**meal** 33:6 38:10  
**meals** 32:1  
**meaning** 53:7  
 96:8  
**meaningful** 37:7  
 115:7  
**meaningless**  
 91:23 92:9  
**means** 40:7 55:21  
 62:5 64:4,20 72:9  
 84:9 103:21  
 112:17  
**meant** 48:5 78:12  
 111:13  
**measurable**  
 107:15  
**measure** 17:22  
**measured** 122:19  
**measures** 30:2  
 101:12  
**measuring** 86:9  
**Meat** 10:16  
**mechanical**  
 19:16 54:1 56:23  
 63:20 66:5 78:16  
 103:14  
**medical** 85:16  
**medication** 44:4  
**meet** 28:16 55:21  
 84:13 88:20 94:5  
 97:10 101:12,14,  
 23 118:5 125:12  
**meeting** 15:9  
 42:6  
**meetings** 110:5  
**Melkonian** 24:12,  
 13  
**member** 27:8  
 70:17 79:19  
 118:24  
**members** 83:2  
 91:15 100:14  
 101:10 115:2  
**membership**  
 91:5,21  
**memo** 77:15  
**mention** 31:24  
 66:19  
**mentioned** 25:13  
 27:13 28:25 66:1  
 77:13 78:6,21  
 81:18,19 91:5  
 94:11 97:13  
 111:9,19 118:7  
**mentions** 75:22  
**message** 127:24  
**messages**  
 103:12  
**met** 58:16,18  
 90:25 91:19  
**metal** 24:19  
**method** 125:3  
**methods** 25:19  
 124:1,21,22  
**Mexico** 67:1  
**mic** 84:3

- microphone** 15:1  
92:19
- microphones**  
118:11
- microplastic**  
103:25
- microplastics**  
46:20 99:10  
104:7,10 116:18  
117:11
- microplastics'**  
120:12
- middle** 50:7  
125:12
- migraines** 73:10
- Miho** 54:20
- million** 44:22  
89:19,21 126:2
- millions** 101:11
- mills** 89:17,21
- mimic** 102:24  
104:11
- mind** 75:3
- mine** 73:5,14  
99:16
- minimal** 50:12
- minimis** 83:23  
84:6,9,13 91:6,14,  
18 92:2,4
- minimize** 64:19  
67:20 68:6,20
- minimizes** 64:21
- minimum** 56:22  
94:23 124:23
- minute** 118:23
- minutes** 9:16
- mismanaged**  
37:18,24
- missing** 22:1
- mission-driven**  
32:4
- mitigate** 24:6  
31:4
- mitigation** 31:3  
55:7 57:10,14,21,  
25
- mix** 108:9
- modalities** 108:6
- modern** 34:14
- Modernization**  
71:3
- Modesto** 22:10  
76:2
- moisture** 104:8  
124:24
- money** 24:9 76:6
- Monica** 125:22
- monitoring** 127:5
- Monterey** 39:16  
43:4 74:6,12
- month** 48:17
- months** 22:15,17  
110:6
- Moorhead** 92:19  
98:16,18
- moot** 19:18 68:3
- moratorium**  
62:11 64:10
- morning** 6:5 7:12  
10:6,9 13:17 15:4  
24:12 27:5 35:6  
44:11 47:24 50:3  
54:19 59:4 69:12  
72:12 82:16  
100:12
- motivated** 40:20
- motive** 78:10
- move** 92:23 98:14  
102:9
- moving** 31:14  
56:24 77:17
- much-needed**  
31:7
- multi-material**  
35:16
- multichain**  
113:12
- multifamily** 44:25
- multiple** 71:18  
103:11 114:19
- multitude** 46:17
- municipal** 80:14,  
17,18
- 
- N**
- 
- named** 27:9 70:18
- naphtha** 64:3
- narrows** 53:2,4
- nation** 72:10
- national** 57:1  
69:13 72:20 89:16  
103:22 113:12,19
- natural** 52:22  
99:11
- nature** 99:3  
111:19 114:2
- nearest** 7:2
- needed** 31:7  
34:23 93:25  
123:4,6
- negates** 64:24
- negative** 27:24  
36:10 116:8
- negatively** 42:13
- negotiated** 74:22  
91:3 110:9
- negotiating**  
69:18 71:8
- neighborhood**  
113:16
- neighborhoods**  
73:2
- Neil** 100:10,12
- 117:14
- network** 61:8
- never-ending**  
24:7
- newer** 77:2
- news** 113:18
- newspapers**  
113:19,20
- Nick** 15:4 18:10  
21:20 29:17
- non-**
- compostable**  
123:17,19
- non-recurrent**  
80:16
- nonbinding** 54:2
- noncompliance**  
97:15
- nongovernment**  
al 12:2
- nonmechanical**  
67:13
- nonnegotiable**  
13:24
- nonpersistent**  
37:21
- nonprofit** 11:17  
27:7
- nontoxic** 82:5
- normal** 73:12  
114:4
- normalized** 73:5
- North** 48:4,8,9,22  
49:1,5,7
- northern** 120:8
- note** 84:25 85:5  
116:23
- notes** 83:12
- nother** 70:16
- notice** 7:18 21:2

- 59:22,25  
**noticed** 7:17 8:15  
**notices** 58:4  
**noticing** 112:6  
**notification**  
58:11 88:19  
**noting** 68:9  
**NRDC** 61:22  
65:11  
**number** 18:15  
40:4 96:9 101:21  
102:3 107:21  
114:12,17  
**numerous** 12:1  
77:7 79:10  
**nutrient** 117:9
- 
- O**
- 
- Oakland** 98:19  
120:6  
**obey** 7:9  
**objective** 107:15  
**objectives** 40:3  
41:6  
**obligated** 114:16,  
19  
**obligation** 26:3  
51:1 88:13  
**obligations**  
51:13 87:3  
**obvious** 41:25  
**occasional** 35:7  
**occurs** 106:3  
**ocean** 39:16  
46:21,24 54:22  
67:11 74:13  
111:11,15 125:25  
**ocean-friendly**  
56:25 57:2  
**Oceana** 39:16  
74:13  
**October** 6:1 9:25  
39:11 119:9,18  
**odd** 93:18  
**odds** 56:4  
**off-ramp** 91:2  
**offer** 37:16,19  
92:3 114:11 117:9  
124:22  
**offered** 34:24  
**offering** 115:3  
**office** 7:16 8:5,7,  
24 9:1,2 86:16  
**official** 8:25 10:22  
**oil** 64:1  
**Olli** 10:10  
**omitted** 26:16  
**on-ramp** 26:11  
**onboard** 96:19  
**one-hour** 118:17  
**one-in-four** 65:19  
**online** 36:23  
58:11 84:1 127:18  
**onus** 40:14  
**open** 17:18 29:22  
81:9 127:10  
**opened** 81:16  
**opening** 80:1  
**opens** 56:9  
**operate** 30:8  
101:10  
**operating** 45:7  
79:12 95:8 124:23  
**operation** 124:23  
**operationally**  
51:23  
**operational** 60:9  
**operations** 32:6  
50:12 60:21  
**operators** 100:24  
113:11,12,22  
**opinion** 12:8  
71:24  
**opportunities**  
11:23 13:6  
**opportunity** 7:25  
11:9,11 13:9  
25:23 42:3 44:14  
50:4 52:14 58:17  
61:11 72:4,19  
82:20 99:2 100:5  
104:21 114:19  
124:15  
**opposed** 94:8  
**opposite** 78:12  
**opposition**  
120:19  
**opted** 94:1  
**optimal** 108:8  
**option** 106:18  
**options** 34:25  
35:18  
**oral** 9:13,21 39:7  
119:13 127:2  
**order** 10:13 25:16  
28:15 37:20,25  
60:23 64:12 66:4  
91:24 101:14  
**Oregon** 109:5  
**Oregon's** 109:17  
**organic** 32:1  
103:18,21,22  
104:19 115:5  
117:2 121:25  
**organization**  
11:14,17 27:18  
75:12 105:16  
107:8 115:21  
**organization's**  
74:21  
**organizations**  
12:2 31:16 39:22  
75:16 79:23  
**origin** 125:14  
**original** 17:16  
32:15 34:8 78:14  
**outcome** 36:18  
**outcomes** 24:24  
**outlet** 65:14  
**outline** 25:8 69:2  
**outlined** 67:24  
82:8 96:15  
**outlining** 45:3  
**over-the-counter**  
20:24 43:8,13,22,  
24 44:4 47:14  
85:13 112:25  
120:22 121:5,11  
126:13,20  
**overexposed**  
28:3  
**overlooked** 73:6  
**overly** 29:7 53:2  
**overreaching**  
12:3  
**overseas** 48:16  
**oversee** 79:13  
**overseen** 79:9  
**overview** 7:23 8:9  
**overwhelming**  
17:23  
**overwrap** 33:12  
**owners** 24:18  
57:8  
**oxygen** 34:16
- 
- P**
- 
- package** 49:18  
91:12 105:6,24  
106:17 108:13  
**packaged** 29:8  
**packaging** 6:8  
11:15 13:14,18,22

- 14:2,10 17:4,24,  
25 18:2 19:2  
24:16,17 28:22  
29:1,2,13 32:12,  
16,19,25 33:4,10,  
17 34:7,8,13,18,  
19 35:8,17 38:14,  
19 40:10 42:4  
43:9,12,22,24  
44:17 45:13 47:20  
50:11,18 56:1  
57:4 70:19,20  
71:5 83:6,8 84:15  
85:10,24 86:24  
87:5,14 89:18  
96:1 97:8 100:17  
101:6,16 103:4,13  
106:12,23 107:17,  
19 108:2,4 109:1  
110:11 112:24  
115:5,6 116:5,10,  
16 120:21 121:11  
126:19
- packing** 85:23
- Pacoima** 21:25  
22:9
- Padron** 82:17
- paid** 60:10,16
- panel** 118:24
- paper** 24:19 34:25  
89:16,17,21  
100:19 103:5  
122:23 123:12,16,  
17
- paper-based**  
89:18
- Pappas** 15:4
- parameters**  
124:23
- parks** 113:4
- part** 8:22,24 10:22  
14:2 15:16 41:9  
48:19 57:1 66:2  
70:14 74:23 79:10  
80:15,18 82:23  
85:17 86:20 87:19  
96:18
- partially** 102:10
- participate** 25:9  
93:17,21 94:10,11  
125:1
- participated**  
113:13
- participating**  
6:15,18 13:11  
55:20
- parties** 12:10 13:7  
109:22
- partners** 24:18
- Partnership**  
105:1
- parts** 73:4
- pass** 60:20 71:11  
100:1
- passed** 18:18  
21:5
- passing** 98:22
- passionate** 46:15
- past** 28:6 36:25
- pathway** 32:17  
33:25 34:11 37:23  
38:5 96:19 107:23  
108:15 110:12  
115:7
- patience** 67:7
- pattern** 33:23
- pause** 71:13
- pave** 30:6
- pay** 22:6 40:25  
41:4
- paying** 71:23 82:7
- payments** 45:24
- peers** 33:7
- pellet** 88:1,7
- pellets** 88:7
- penalized** 45:20
- penalties** 89:1
- penalty** 46:1
- Pending** 127:9
- people** 9:16 10:25  
18:1 28:7 29:9  
35:5 49:16 65:19  
68:7 71:8 118:4  
127:18,22
- people's** 35:11
- perceive** 94:5
- percent** 33:19  
64:5 65:15 71:5,  
25 74:20 75:24  
90:10,15,24  
102:5,6 103:19
- percentage**  
96:25
- perfect** 11:3 37:1
- performance**  
125:14
- performative**  
32:6
- period** 7:19,21  
8:17 9:7,25 16:20  
39:11 52:9,11  
76:22 86:4 106:6  
108:25 119:9,17
- permanence**  
40:6
- permanent** 6:9  
9:6 16:22 45:16  
82:21
- permanently**  
40:10 42:4 72:1
- permissibly** 53:3
- permission**  
103:9
- permit** 16:4 19:18  
30:14 66:20 67:4  
68:4 79:8,12
- permits** 23:6  
53:21 56:7 63:3
- permitting** 68:9,  
10,17,23
- perpetuated**  
27:21
- persist** 37:25
- persistent** 122:24
- persists** 52:10
- person** 6:15 9:20  
10:1 11:2 13:11  
22:16 39:5 89:7  
100:9 104:23  
119:12,19 126:25  
127:7
- person's** 111:16
- personally** 21:4  
32:24
- perspective**  
27:14 32:12 75:17  
90:2 115:19
- pertaining** 59:17
- PET** 48:19
- Petaluma** 31:25
- petitions** 18:19,  
21
- petroleum** 64:3
- PFOS** 104:2
- PHA** 38:1
- phased** 76:7
- physical** 103:3
- Physicians** 21:16  
127:13
- picking** 99:6
- piece** 39:24 91:4  
106:14
- pieces** 99:6
- pile** 124:1
- pitfall** 17:15
- pizzas** 32:2
- PLA** 38:1
- place** 59:16,18  
106:25

- plain** 43:19
- plainly** 123:10
- plan** 35:12 41:21  
80:16 107:8 109:6
- planet** 68:7
- plans** 106:1
- plant** 23:11  
104:13 117:12
- plant-based**  
33:4,18 35:19
- plants** 126:4
- plastic** 6:7 11:15  
13:5 17:5,11 20:1,  
13,15 21:5,24  
24:6,20 27:11,23  
28:1 29:12,13  
30:25 31:3,18  
32:19 33:11,12  
35:2,24 38:6,8,9,  
11 46:16,24 47:2,  
10,15,25 48:12,  
14,16 49:9,10  
54:21 56:18 57:13  
62:11 63:22,25  
64:5 65:17 66:6,7,  
8,25 72:20,23,24  
73:22 74:11 76:16  
77:21,22,23 78:1,  
9 81:25 83:11,13,  
21 84:22,23 91:9  
96:1 98:24,25  
99:12,19 100:2  
101:22 102:10  
103:23 111:6,8,  
10,23 112:1,6,13,  
18 113:3 116:5  
118:7 120:14,16  
121:2,6 123:3,13,  
18,19 124:11  
125:25 126:9,14
- plastic-covered**  
74:20 75:1
- plastics** 11:5  
19:24 20:2 21:18  
28:1,5 32:22  
34:22 35:14 36:8  
37:17,21 38:2,17,  
24 55:11 61:21
- 67:11 76:6 82:3  
83:15 84:10 87:24  
99:21 101:1,22  
102:4,22 103:8,17  
104:10,11 111:5,  
12 112:10,14  
113:5 117:8,19  
126:1 127:15
- plastics-to-fuel**  
19:21
- platforms** 32:8
- play** 110:2
- playing** 68:14  
81:8
- pleas** 127:21
- PM** 118:18,19,20,  
22 127:11
- podium** 9:21 10:4  
39:6 119:13,21  
127:1,8
- point** 15:7,9 24:8  
30:25 61:24  
62:10,17,22 63:6  
66:23 76:25 120:9  
122:25 127:17
- pointed** 111:23
- pointing** 25:23
- points** 15:10 45:5  
48:1 61:17 82:24  
84:17
- policies** 14:17  
73:15,16
- policy** 25:2 33:21  
43:4 67:11 104:25  
121:3
- polling** 17:21
- pollutants** 21:12  
30:21 47:9 112:14  
120:25 126:8
- pollute** 47:15  
121:7 126:15
- polluter-pays**  
82:6
- polluters** 30:2
- polluting** 19:2  
30:20 66:22 82:12  
99:20
- pollution** 6:7  
11:15 31:3 38:8  
43:6 46:16 47:2  
54:21 57:13  
65:16,19 72:20  
73:5,24 76:16  
78:17 80:24 96:1  
98:24,25 99:19  
100:2
- polyethylene**  
124:12
- polymer** 123:1
- polymeric** 122:24
- polymers** 104:4  
123:3
- polystyrene** 55:8  
58:5,15,22
- population** 26:18
- populous** 95:24
- portal** 9:24 39:10  
58:12 119:16
- pose** 20:2
- position** 123:14
- possibility** 29:23  
38:6 94:12
- possibly** 7:5
- post-consumer**  
86:7
- pot** 124:24
- potential** 38:15  
55:14 103:6
- potentially** 23:9,  
11 28:25 71:4  
83:16
- power** 126:4
- powers** 77:8
- PPMF** 31:7
- PR** 93:20
- practical** 51:25
- Practically** 90:16
- practices** 63:16  
120:23
- prediction** 71:20
- prefer** 90:20
- preferences**  
124:5,8
- preferential**  
68:16
- premises** 59:19
- prepare** 109:23
- prepared** 32:1  
52:25
- prepares** 109:24
- prescribe** 60:6
- prescription**  
43:15
- prescriptive**  
17:17
- present** 8:2 12:10  
63:10
- presenting** 64:23
- presents** 101:16
- preserve** 115:24
- preserves** 32:15
- president** 110:25
- pretty** 16:10 60:13  
118:6
- prevent** 20:22  
21:6 45:23 53:10  
95:4
- preventing**  
62:24,25
- prevention** 6:8  
11:15 43:7
- previous** 43:21
- previously** 19:10  
43:18 46:18 67:14

- 85:15
- price** 48:20 56:22  
57:8
- primarily** 84:15  
107:3 123:12
- primary** 43:20  
66:6 101:13  
117:15
- prior** 74:16
- priorities** 13:24
- prioritized** 14:1
- priority** 106:7
- PRO** 11:22 14:14  
41:4,21 53:6  
55:18,20,25 59:23  
60:7,11,16,17,20  
70:12,13 74:24  
77:7 88:24 89:2  
93:11 94:8,14  
95:8 97:19  
108:17,21
- problem** 19:22  
30:13 46:17 77:4
- problematic** 42:8  
56:10 122:21
- problems** 18:16  
31:10 40:16 99:13  
112:12 117:20
- Procedure** 17:6
- proceedings**  
6:13
- process** 14:20  
15:16 17:7 22:15  
28:5 31:15 32:13  
33:24 41:16 42:8  
45:15 47:21 50:20  
57:11,15,19 58:1  
60:10,23 61:12  
64:6 76:19 77:9,  
15 78:15 88:24  
89:2 91:2,14  
93:25 99:19  
101:21 106:25  
108:25 109:12  
113:1,13 114:18  
122:5 126:21
- processed** 49:5
- processes** 25:7  
28:1 30:22 57:20  
63:24
- processing** 88:8  
96:3 97:22 100:19  
101:25 103:1,16  
124:18 125:5
- processors** 12:1
- produce** 56:19  
63:25 66:4 76:10  
120:15
- produced** 49:4  
111:13 113:5
- producer** 6:8  
11:14,16 13:14  
25:8 40:14 41:15  
43:6 50:16 83:4  
87:7 105:15 107:7  
114:2,16,19 116:6
- producer-led**  
11:17
- producers** 11:18,  
25 12:18 14:12  
20:25 23:3,7  
24:17 25:9 28:21,  
25 29:23 30:2  
31:25 40:20 42:1,  
17 44:18 46:2  
55:22 58:5,14  
59:15,19 69:25  
70:3 73:21 82:7  
86:5,25 87:1,2  
90:12 93:8 96:2,  
14,17,19 100:16  
107:14,18 109:21  
116:10
- producers'** 26:18  
83:19
- produces** 66:7
- producing** 20:13  
37:10 78:17 79:14  
81:24
- product** 8:6 33:14  
49:20 102:9  
103:8,20,23 117:3  
122:7 123:11
- production** 20:16  
31:1 56:7 68:1,13  
69:3 74:11 82:3  
89:20 99:21  
102:1,8
- productive** 94:24
- products** 33:25  
34:11 35:20 37:4,  
9 38:8,22 43:10  
47:13,14,20 49:21  
50:9 57:7 63:23  
77:13 78:2 81:25  
82:1 85:16 96:9,  
25 101:14 102:14,  
17 103:5,12 104:1  
106:24 112:25  
113:25 117:18  
120:22 121:5,18  
122:5,14 123:20,  
23 124:15,18  
125:6,8,9 126:12,  
13,21
- profit** 78:10
- program** 8:3  
12:19 13:8 25:20  
26:7 27:1,7 40:4,  
11 41:3,10 42:4  
44:24 56:21 57:2  
76:7 82:6 93:18,  
20 103:22 108:15,  
16 109:5,6,19,22  
114:3
- program's** 12:13
- programs** 76:3  
82:10 93:19 102:2  
107:25
- prohibit** 93:22
- prohibited** 19:15  
94:16
- prohibition** 19:18  
55:9 56:16 62:11  
64:10
- project** 8:4 23:13
- projects** 22:3  
23:15 75:11,15  
79:18
- promise** 116:7
- promising** 117:1
- promote** 115:25
- promoted** 78:11
- proof** 33:5
- Prop** 86:18
- proper** 102:12
- properly** 107:8
- properties** 34:12,  
15
- proportion**  
102:17
- propose** 67:25
- proposed** 7:15  
8:1,12,19,25 9:6,  
10 10:14,20 15:14  
24:25 26:2 29:18  
39:21 40:1 43:5,  
12,18 44:15 51:8  
53:13,16 54:14  
68:5,15,25 74:14  
82:21 96:13 97:2  
99:15 118:23  
119:4,7 121:21
- Proposition**  
86:17
- Propublica** 65:14
- PROS** 45:21
- protect** 17:11  
20:14 31:1 45:24  
47:5 73:16,25  
117:16 126:5
- protecting** 19:19  
21:11 120:10,11
- protection** 66:14  
67:3
- protections**  
19:12 63:4 73:7  
99:18
- protective** 7:8  
80:7
- protein** 13:18,22  
14:1,4,18

- protocol** 109:19
- protocols** 71:3
- proud** 33:1 69:18
- prove** 98:4 125:3
- provide** 19:15  
21:1 25:16 33:12  
34:22 35:14,20  
51:18,25 52:8  
53:5 54:10 58:6  
66:14 82:20 86:1,  
23 98:14 115:9,  
10,12 120:15  
122:4,15
- provided** 48:24  
50:21
- provider** 94:13  
108:18
- providers** 12:18  
45:23 60:7,15  
88:11 89:1 93:17,  
21,24 94:2,4 95:7  
97:20
- providers'** 88:12
- providing** 39:18  
44:22 58:10  
63:18,19 67:8  
82:18 83:9 87:10
- proving** 46:22
- provision** 26:16  
42:15 106:15,16
- provisions** 10:15  
25:13 52:9 53:6  
120:19
- proxy** 11:6
- PSR-LA** 22:1
- public** 6:7 7:15,  
17,19,21 8:11,16,  
17 9:6,8,24 13:23  
17:20,23 18:13,15  
21:2 22:18 25:1  
28:12 31:1 35:1,  
11 39:10 46:4  
47:9 57:22,24  
64:22 67:22 69:9  
73:25 81:15,23
- 93:22 97:3 102:15  
106:6 112:15  
116:8 119:8,16  
121:1 126:8
- published** 7:16  
8:15 96:21 124:21
- publishing** 7:18
- pulling** 92:1
- pumping** 23:19
- purchases**  
116:24
- purely** 79:2
- purification**  
62:13
- purports** 32:22
- purpose** 7:14  
10:19 18:3 32:11  
86:9,11 88:25  
119:5
- purposes** 51:7  
87:2
- pursuant** 88:18
- pursue** 97:1
- put** 17:10 23:9,19,  
21 49:24 94:19  
109:7 111:25  
112:4 118:1 123:9
- puts** 40:14 83:8
- putting** 24:1,8,9  
118:8
- pyrolysis** 23:11  
62:1,4,11 63:6,24  
64:1,6,11 65:17  
81:4
- 
- Q**
- 
- qualification**  
91:19
- qualified** 71:13
- qualify** 92:4
- quality** 16:6  
103:8,22 117:3
- quantifiable**  
29:20
- quantities** 15:23  
16:3
- quantity** 16:6  
56:7
- question** 40:25  
90:17
- questions** 59:7,9,  
17 60:13 61:1  
87:11 115:1
- quick** 118:1
- quickest** 19:9
- quickly** 50:24  
72:5 110:1 111:25
- quo** 17:20 69:1
- quotation** 62:6
- quote** 107:16  
114:15
- 
- R**
- 
- R&d** 32:25
- Rached** 61:6
- racism** 27:21 31:8
- raise** 9:22 39:7  
48:1 49:8 110:21  
119:14 127:3
- raised** 10:3 28:17  
42:5 44:6,10 59:3  
61:20 89:9 92:11,  
23 95:16 119:22  
127:6
- raising** 28:10
- ramifications**  
21:21 22:4 127:20
- range** 16:17 23:9  
77:13
- ranging** 113:11
- rapid** 107:6
- rate** 53:9 58:16,19  
90:9,15,22,24  
110:2
- ratepayers** 44:18  
45:10,24 59:12  
60:24 93:8 94:7,  
15 95:10 97:7  
103:1
- rates** 97:10 107:9
- reach** 107:9 120:9
- reached** 28:7
- reaching** 58:9
- read** 41:2 65:13
- reads** 90:12
- ready** 119:3
- real** 19:1 20:6  
47:17 72:17,20  
90:16 105:20  
112:20 113:3  
114:5 121:8 124:5  
126:17
- realities** 34:5
- reality** 34:13,15  
35:10 36:5 37:6  
99:5
- realized** 97:5
- reason** 62:21 80:4  
88:17 120:16
- reasonable** 37:19  
108:23 124:25
- reasons** 7:22  
8:22,23 10:22  
29:4,12 38:10  
40:5 42:18 119:11
- rebrand** 18:2
- rebranding** 17:18
- recall** 65:13
- receipt** 127:9
- receive** 7:15 9:11  
10:20 11:1 45:16  
119:6 125:2
- received** 7:20

- 8:21 119:10
- receiving** 89:12  
100:18 118:25
- recent** 16:13  
106:16 120:19
- recently** 93:23  
124:21
- recess** 118:19
- recipients** 60:7,  
15,19
- reclaimer** 48:19
- reclaimers** 48:14
- recognize** 14:14  
35:5 50:17
- recognizing**  
13:21 37:10 85:25  
86:15 106:4
- recommend**  
25:11 52:3 83:22  
84:23 124:20
- recommendation  
s** 45:4
- recommended**  
75:18
- recommending**  
84:11
- recommit** 26:8
- record** 15:15 81:1  
117:7
- recorded** 6:11
- recovered** 90:14  
93:10
- recovering**  
94:13,14
- recovery** 88:1
- recycla** 44:24
- recyclability**  
97:11 108:21,24
- recyclable** 17:25  
26:14 35:18 38:20  
48:10 107:23  
108:15 110:4
- 116:12
- recycle** 11:21  
49:15 89:20 108:4
- recycled** 48:12,15  
49:3,4,12,19,22  
53:8 64:8 82:1  
84:16
- Recyclemore**  
59:6
- recycler** 108:18
- recyclers** 47:25  
49:1,7
- Recyclers'** 84:22
- recycling** 15:17  
19:13,14,17 21:21  
22:4 23:9,25  
24:18 26:7 30:15,  
19,22 31:10 35:22  
36:3,6,9,10,13,17  
45:23 47:6,8,17,  
18 48:4,6,7,21  
49:11 53:9,13,17,  
25 54:1,7,8 56:3,  
10,16,18,21,22,23  
58:16,19,21 61:25  
62:5,6,7,15 63:10,  
12,15,21 64:7  
65:1,8 66:3,5,7,9,  
18 67:13,18,19  
68:6 69:22 72:17,  
23 73:20 76:3,7  
78:9,16,25 81:2,6,  
8 82:5 84:24 85:8  
88:10,12,25 90:9,  
22,24 93:7,20  
97:10 99:18  
102:25 105:1  
109:3,8 110:2  
111:4,6 112:11,  
21,22 113:3  
120:20,24 121:3,9  
126:6,7,17,18  
127:20
- redesign** 108:3
- reduce** 11:21  
14:16 20:12 24:5  
30:25 32:23 37:13  
47:10 56:20 73:22
- 74:10 78:7,19  
82:3 97:6 114:25  
121:1 126:9
- reduced** 75:1  
97:3
- reduces** 95:8
- reducing** 13:5  
19:23 46:15 95:25  
103:2 112:13  
116:7
- reduction** 26:17  
35:2 38:9 43:6  
49:3 55:22 60:21  
74:15,16 75:5,6  
86:9 91:9
- reductions** 82:5
- redundancy**  
14:16
- redundant** 15:10
- reexamine** 26:21
- reference** 83:5,23  
84:6
- referenced**  
104:20 123:25
- references**  
122:18
- refers** 56:11 81:23
- refill** 25:13 29:19  
30:7 55:6,24 56:1,  
24 57:5 82:5
- refillable** 29:21  
57:3 77:20,25  
85:20,23
- refine** 84:9
- reflect** 49:18 54:8,  
25 91:1 100:14  
102:7
- reflective** 78:22
- refused** 93:21
- regard** 82:25  
83:11,14 85:20  
88:9
- regs** 40:1,12  
42:11,14 69:24  
70:9 85:9,19  
117:17 122:22  
123:8
- regularly** 12:5
- regulate** 23:4
- regulated** 10:15  
17:9 52:1 77:6
- regulation** 18:20  
20:6 43:25 47:2  
48:25 56:4 60:5  
66:10,13 67:2  
75:6 76:21 79:25  
82:22 84:20 85:15  
87:25 90:4 94:9,  
16 98:6 105:23  
106:2,13
- regulations** 6:9  
7:14,15 8:1,19,25  
9:3,7 10:20 11:11  
12:11,15,23 13:21  
15:14 16:18,25  
17:8,16,18 19:8,  
17 21:10 22:20,25  
23:24 27:16  
28:13,14,18,23  
29:2,14,21,22  
30:13 39:20 41:8,  
23 43:5,12,18,22  
44:3,15 45:2 47:5,  
12,17 48:2,3 51:8  
52:25 54:7,14  
55:4 56:15 57:16  
59:8,15 60:14,19  
61:14 62:9,23  
63:17 67:3,15,25  
68:5,15,19,25  
70:6 71:19 72:16  
73:22 74:2,14,17  
75:4 76:12,18  
77:3,5,9,18 78:3,  
8,14 81:9,13,15  
82:4 84:10 88:11  
90:5,11 91:1 92:1  
93:12 94:2 96:6,  
14 97:2,24 98:9  
99:15 105:18,21  
107:13 109:16  
112:16,20 118:23  
119:4,7 121:8,13

- 126:5,11,16  
127:25
- regulatory** 8:12,  
14 9:10 10:14  
17:7 26:19 76:19  
80:3 83:13 91:12,  
20,23 92:8 105:6,  
24 106:16 108:13,  
19 110:12 113:14
- reimburse** 97:19
- reimbursement**  
25:19 60:8,16
- reinforce** 56:3
- reinforcing** 41:13  
63:19
- reinstatement**  
104:18
- Reit** 95:17,21
- reiterate** 69:19  
71:1
- reiterates** 26:10
- rejected** 35:1
- rejections** 107:6
- rejoin** 118:25
- rejoining** 119:3
- relate** 53:7
- related** 28:1 74:8  
83:1 86:24 87:22,  
25 110:2 123:4
- relates** 53:17 65:7  
83:5 87:7,18 88:6
- relationships**  
51:5
- relative** 75:2
- released** 28:8  
30:22
- releases** 72:25
- releasing** 20:3
- relevant** 29:13  
65:21
- reliance** 14:6
- 37:13 80:21
- relied** 101:8
- relies** 54:1
- relocate** 7:9
- relocation** 7:6
- rely** 94:17
- relying** 16:9 80:5  
96:16
- remain** 25:25  
96:18 115:7  
116:15
- remaining** 26:25
- remains** 14:4
- remind** 14:25
- reminder** 9:7
- remotely** 6:15
- removal** 74:15  
102:20
- remove** 45:12  
99:22 102:11  
122:13
- removed** 42:4  
88:6 96:10
- removing** 25:12  
38:4 101:19 102:3
- Renaud** 31:21
- rendered** 68:3
- Renee** 52:19,21
- renewable** 33:3  
35:19
- repeat** 10:19  
15:10 39:4
- repeated** 17:21  
42:11
- repeatedly** 15:6  
30:11
- repetition** 61:13
- repetitious** 9:17
- repetitive** 76:24
- replace** 33:17  
38:15
- replaced** 35:8,18
- report** 28:8 33:1  
75:22,23 83:20  
91:9,16,22 92:7  
125:3
- reporter** 6:12  
92:18
- reporting** 50:23  
51:1,13 54:3  
91:21
- represent** 21:23  
50:5 73:19 89:19  
101:24 113:10
- representation**  
57:18
- representative**  
54:22 75:13
- representing**  
13:18 75:14  
125:22
- represents**  
24:16,18 29:25  
36:25 115:22
- reproductive**  
27:18,24 30:24
- reputation** 117:5
- request** 25:7  
42:17 71:12 88:18  
106:18 108:22  
122:13
- requested** 34:21
- requests** 26:8
- require** 12:25  
34:21 43:15 45:21  
94:2,22 96:17  
102:5 107:5  
122:9,23
- required** 6:21,25  
75:1 88:24 97:1  
122:4,15 125:9
- requirement**  
56:17 68:18 74:19
- 93:16
- requirements**  
34:13 43:16 52:2  
53:8,9 66:15  
67:24 68:10,17,23  
85:17,22 87:13  
95:4 97:10,17  
98:2 102:15  
121:24 125:11
- requires** 35:4  
84:14 86:8,11  
97:19
- Research** 18:13
- residence** 124:24
- residents** 44:22  
45:9 73:3,20  
116:7
- resin** 103:12
- resistance** 33:12
- resolve** 12:17  
51:8,19 99:14
- resolved** 52:12
- resources** 23:21  
52:22 102:15
- respiratory** 30:24
- respond** 7:20  
8:21
- responded** 10:21  
119:10
- response** 28:12  
123:10
- responses** 61:2
- responsibilities**  
30:3 77:8
- responsibility**  
6:8 11:14,16  
13:14 21:16 43:6  
44:17 70:3 78:4  
96:1 105:15 107:7  
114:2 116:6  
127:14
- responsible** 23:2  
62:20,23 64:19  
65:5 69:15 70:8

87:23,24 104:17  
108:10 109:4,11,  
14,16 116:15  
117:17 121:21  
122:7 124:16  
126:1

**responsibly**  
122:5 124:18  
125:5

**responsive** 26:9

**rest** 110:15 112:5

**restart** 119:3

**restarting** 118:22

**restate** 69:20

**restaurant** 113:9,  
20,22 114:8

**restaurants** 57:1,  
2 113:17,24 115:8

**restore** 44:3

**resubmission**  
107:5

**result** 13:7 34:20  
35:10 38:5,8 62:9  
63:21 71:20 96:11  
121:6 126:14

**resulting** 103:3

**resume** 118:25

**Resynergi** 23:12

**retaining** 117:17

**retired** 96:12

**returning** 85:7

**reusable** 18:2  
29:20 38:21 57:3  
77:19,25 85:20,23  
116:12

**reusables** 17:19

**reuse** 17:15,17  
25:13 29:18,24  
30:7 55:6,24  
56:24 57:5 82:5  
118:1,3,5,9

**revenue** 60:22

101:15

**review** 9:2 85:17

**reviewing** 41:18

**revise** 51:22  
87:16

**revised** 51:24

**revisions** 87:25

**revisit** 69:10

**revolt** 35:11 71:23

**rewrite** 95:2

**rewriting** 92:1

**Richmond** 6:5,6  
9:5 10:8 42:22  
44:9 46:10 50:1  
52:19 54:17 59:2  
92:15,25 95:16,19  
98:12 100:10  
119:23 120:3  
121:15 125:18

**rife** 114:19

**rights** 27:18

**rigid** 36:6 38:9

**rigorous** 78:15

**ripple** 55:23

**risen** 102:4

**rising** 98:25

**risk** 20:18 23:16  
47:3 53:19 56:12  
64:21 65:15,19,24  
117:3

**risks** 20:10 23:13

**robust** 28:4 48:6  
82:23 105:8  
107:1,9

**role** 38:21 59:11

**rolling** 71:11

**rolls** 27:1

**room** 6:16,25 10:4  
11:1 14:25 32:16  
42:23 52:18 61:5  
69:16 92:13 100:8

127:18

**rooted** 31:25

**rose-colored**  
112:8

**Rosiers** 31:20,21

**rough** 66:20

**roughly** 44:25

**round** 64:7

**Roxanne** 11:4

**rplanet** 48:18

**ruined** 111:25

**rule** 26:15 51:24

**rulemaking** 7:25  
8:10,15,25 9:2  
10:23 24:23 32:14  
33:24 38:6 50:20  
51:15 106:1

**rules** 9:12 14:3  
24:25 25:4,18  
26:3,24 28:23  
77:11 103:22

**rulings** 107:6

**rural** 68:21 75:21

---

**S**

---

**Sacramento** 6:1  
98:19

**safe** 14:5 20:6  
52:8 96:18

**safeguard** 67:5

**safeguards**  
66:16

**safely** 33:13  
101:7

**safety** 13:23  
17:11 18:17 64:22  
70:24 71:3,14  
106:19 117:4

**salami** 10:10

**sales** 56:22

**Salumeria** 10:10

**San** 73:4 95:23

**Sanborn** 69:12,13

**Sanitation** 44:13

**Santa** 125:21,22

**Santillano** 8:3  
18:10 84:1 110:20  
118:14

**Sarah** 10:5,6,9,24

**satisfy** 108:23

**savings** 60:9,21  
95:10 97:4

**SB** 6:7 9:6 11:22  
12:12,24 13:7  
14:23 19:14  
22:19,22 25:10  
26:1,11 28:5 30:6,  
25 31:11,14 33:23  
34:7 38:13 40:3,9  
42:6 43:14 44:15,  
16 45:11,19 46:2,  
8 47:1 48:5,10  
53:6,20 54:9 56:5,  
11,17 57:19 68:12  
69:18 70:18 71:16  
72:16,22 73:16,18  
74:10,22 75:8  
76:13 78:13 81:4,  
7 82:8 86:8 87:2,  
20 93:6,9 94:5  
95:1,25 96:12,18,  
22,24 97:6,9,10,  
16,18,20 98:2,4,  
22 100:15 102:2  
106:14 107:14  
108:24 109:23  
110:10 113:14  
116:6,9 118:23  
119:4 120:17,24  
121:8

**scale** 25:16 66:25  
100:23

**scam** 81:23

**scary** 120:13

**scenario** 64:4

**scenarios** 114:17  
115:2  
**science** 104:6  
116:19 123:15  
124:7,9,14 125:15  
**scientific** 122:16  
**scientifically-**  
**bankrupt** 123:14  
**scientist** 52:22  
**scope** 27:2 43:23  
83:19 88:8  
**scraps** 37:12  
**season** 73:11  
**secondarily**  
60:18  
**secondary** 43:9  
**seconds** 46:25  
111:11 125:25  
**section** 8:4 15:20  
23:1,2 39:25 40:1  
42:19 45:13 50:15  
67:24 68:19 69:5,  
10 78:4,25 82:25  
84:12,14 85:22  
86:14 93:15 96:7,  
8,15 104:15  
122:22 123:7  
**sections** 63:9  
88:16,18 104:20  
127:19  
**sector** 14:18  
25:17  
**security** 14:1  
**seek** 60:8,16 94:3  
**seeking** 20:25  
56:20  
**sees** 42:7 62:8  
**select** 6:19  
**selected** 11:13,22  
**sell** 48:11  
**Senate** 86:10  
**Senator** 81:4,11  
**send** 114:3  
**sending** 58:3  
127:23  
**senior** 52:21  
54:20  
**sense** 66:10  
124:13  
**separate** 65:18  
83:20  
**Separating** 98:3  
**separation**  
103:15  
**sequencing** 13:3  
**Serlin** 24:13  
**serve** 93:5 101:1  
**serves** 44:21  
88:24  
**service** 12:18  
34:18 35:17,24  
36:16 45:23 50:11  
60:7,15 83:1,5,6  
88:11,12 89:1  
93:17,21,24 94:2,  
4,13 95:7 97:20  
101:15 108:17  
115:7  
**services** 11:20  
45:9 95:22 100:23  
**servicing** 44:24  
**serving** 54:23  
**set** 12:24 38:15  
55:18 76:18 78:15  
81:13 83:23 86:17  
100:2  
**sets** 14:22 120:17  
**setting** 15:2 84:11  
**settings** 86:19  
**shameful** 72:2  
**shaping** 46:6  
**share** 32:11 33:7  
51:3 105:7 115:19  
**shared** 12:4 13:5  
69:8 70:21 95:10  
**Sharp** 52:21  
72:12,13  
**shattered** 112:7  
**shelf** 33:12  
**shift** 42:24 44:16  
45:10 56:9 59:14  
61:10 67:25 69:25  
73:23 93:7 116:11  
**shifted** 23:14  
**shifting** 58:19  
96:1  
**Shira** 117:24  
118:15  
**shirk** 30:3  
**short** 27:17 60:5  
90:5  
**short-sighted**  
37:5,6  
**shortage** 113:18  
**shortly** 54:11  
**shouldering**  
76:15  
**show** 58:18 65:1  
111:14  
**showed** 65:14,18  
112:8  
**showing** 78:23  
**shown** 13:22  
65:12  
**shows** 8:10  
**side** 39:12 50:9  
61:5 100:8  
**sides** 71:21  
**signage** 103:10  
**signals** 7:10  
**significant** 15:23  
16:3,5 27:23  
28:14,18 33:2  
34:22 37:16 38:21  
53:18 54:4 56:7,9,  
19 63:22 65:2  
66:19 67:17 79:6  
83:17 85:24  
101:16  
**significantly**  
37:13 96:8 98:24  
100:1 102:4  
114:23 120:16,23  
**signs** 7:4  
**similar** 42:16  
72:24 77:5 84:25  
**Similarly** 99:16  
**simple** 60:14 61:1  
**simplify** 14:16  
**simply** 34:14  
35:17 45:20 63:1  
77:14 95:4 101:21  
**single** 15:8 17:3  
111:16 116:25  
**single-unit**  
113:11  
**single-use** 29:11  
77:22 81:25 99:21  
116:4  
**sinister** 38:22  
**Sirine** 61:6  
**sit** 50:7 109:9  
111:1  
**site** 7:6  
**site-polluting**  
75:19  
**situation** 31:6  
84:25 122:3  
**Sixth** 41:23  
**skirting** 54:4  
**slide** 8:10  
**slightly** 77:23  
**slowly** 76:7  
**small-format**  
35:17,25

- smaller** 94:20
- smallest** 115:22
- smoke** 73:9
- snacks** 32:2
- so-called** 30:15  
38:8 62:6,14 64:6
- social** 21:16  
36:10 127:14
- soil** 30:19 100:19  
104:3,12 111:15  
117:11
- soils** 36:21 80:17  
116:1
- sold** 38:19 102:17  
116:25
- solicit** 8:11
- Solid** 93:3
- solution** 99:19  
101:18
- solutions** 19:2  
29:23 72:20,21
- solve** 18:16 19:3  
112:11
- solvent** 66:2
- solvent-based**  
62:13
- solvents** 65:3
- solving** 19:21
- solvolysis** 62:12  
64:12 81:5
- SOREL** 75:21
- sort** 15:15 41:14  
77:21
- sorts** 29:4 30:23
- sound** 81:1 93:18  
98:16
- soups** 32:3
- source** 26:17 43:6  
49:2 55:21 73:22  
74:11,15 75:5,6  
82:5 86:9 91:9
- source-produce**  
116:11
- source-reduce**  
74:19
- source-separated** 90:8,  
23
- sources** 49:5
- South** 27:19
- southeastern**  
73:4
- Southern** 48:18
- Spanish** 6:13,16
- speak** 11:11  
14:25 27:1 68:8  
98:20,21
- speaker** 98:14
- speakers** 9:18  
105:10,11
- speaking** 11:6  
44:12 61:7 95:21  
109:9 124:14
- specialized** 14:9
- specific** 15:1  
16:17 40:19 50:25  
53:12 67:23 90:13  
99:13 104:8  
115:11
- specifically**  
15:20 19:11 28:6  
31:4 43:11 49:2  
52:3 66:16 83:6  
84:10
- specifics** 37:18
- spectrum** 11:24
- spend** 99:5
- spent** 99:1
- Spiekerman**  
11:3,5
- spirit** 38:13,18  
46:7 89:11
- spoken** 9:16
- 99:16
- spokesperson**  
9:19
- sprayers** 49:16
- stability** 71:16
- stable** 14:11  
122:6 125:4
- staff** 7:2 8:6 24:22  
41:17 55:3 78:20  
94:21 105:4
- stage** 100:2
- stairs** 7:7
- stairways** 7:5
- stairwell** 7:8
- stakeholders**  
14:21 50:19 72:5  
109:23
- stakes** 113:15
- stance** 105:2
- stand** 28:19 30:14  
84:3 110:20
- standard** 54:2  
68:7 80:22 84:13  
107:16 118:5  
122:13 123:24
- standards** 14:3  
29:18 56:13 57:3  
101:24 102:5,7,13  
110:3 125:8
- standpoint** 91:23  
92:8
- stands** 26:12  
114:13
- Stanislaus** 75:24  
76:2
- stark** 42:6
- start** 39:12 61:5  
100:7 105:1  
122:10
- started** 7:18 39:4
- starting** 8:16  
55:13 82:9
- state** 20:7 33:22  
38:20 39:21 47:18  
48:22 51:7 52:5  
53:2 56:20 57:23  
71:10 72:18 75:18  
76:1,4,16 79:11  
80:4 81:22 88:11  
94:23 95:3 96:12,  
24 104:25 113:11,  
19,22 116:1  
120:18 121:9  
126:18
- State-led** 55:8
- stated** 90:25  
91:25 93:9
- statement** 7:22  
8:22 10:22 15:25  
17:10 88:17  
119:10
- statements** 8:23  
43:20
- states** 47:3 71:10
- statewide** 27:9
- statistic** 111:9
- statistics** 90:19  
120:12
- status** 7:24 17:19  
51:11 69:1
- statute** 15:22  
22:23 32:15 34:8  
38:18 43:19 53:5  
56:5,9,15 62:15  
64:13,17,18 65:25  
66:15 67:16 70:10  
83:23 84:7 85:16  
96:11,12 97:1  
107:10 110:10  
125:13
- statute's** 53:8,14
- statutory** 15:18  
43:13 53:20  
62:19,24 68:18  
74:25 102:15
- stay** 48:15 105:16
- steam** 64:7

**steps** 7:24 8:9  
 10:12  
**stewardship** 8:4,  
 7 69:14  
**stifle** 57:7  
**stifling** 38:14  
**stop** 99:21  
**storage** 97:22  
**store** 90:23  
**strategies** 43:7  
**straws** 34:25  
**streams** 102:25  
**street** 7:6,11  
 111:21  
**strength** 14:7  
 20:6  
**strengthen** 21:10  
 47:16 72:16  
 112:20 121:8  
 126:16  
**strengthened**  
 18:22  
**stress** 114:7  
**stretched** 15:18  
**strict** 29:19 30:1  
**strides** 33:2  
**strike** 42:19  
**stringent** 68:17  
**striving** 32:5  
**strong** 14:22 19:8  
 73:18 82:4  
 116:15,18 120:18  
**stronger** 81:14  
**strongly** 42:18  
 44:16 85:12,21  
 86:3 91:24 96:7  
**structure** 46:1  
 103:9  
**struggle** 87:6  
**struggling** 48:15  
**student** 110:25  
 125:21,22  
**students** 98:20,  
 22 99:2,25 111:2  
**subject** 21:1  
 29:14 89:1  
**subjected** 46:1  
**subjective** 28:24  
**submissions**  
 107:12  
**submit** 7:25 9:23  
 11:9 39:9 45:2  
 119:15 125:3  
**submitted** 8:23  
 11:10 15:6 70:21,  
 25 82:23 96:4  
 114:10  
**submitting** 12:21  
 44:1 52:23 54:11  
 55:4 61:18 89:22  
 93:14 104:14  
 125:16  
**Substances**  
 79:10,24  
**substantial** 23:6  
 79:8  
**substantiate**  
 90:21  
**substantively**  
 32:18  
**substitute** 124:6,  
 8  
**success** 12:13,14  
**successful** 13:12  
 14:22  
**successfully**  
 37:9  
**suffer** 30:5  
**sufficient** 106:21  
**sufficiently** 29:19  
**suggest** 107:3  
 109:4,20  
**suggested**  
 114:15  
**suggestion**  
 106:15 123:11  
**suggestions**  
 21:10 108:14  
 114:21 115:3  
**suggests** 83:3  
**suing** 81:22  
**suitable** 34:11  
**suits** 81:21  
**summary** 125:7  
**sunk** 101:4,5  
**supermarket**  
 71:6  
**supervisor** 7:13  
**suppliers** 51:2,7,  
 11  
**supplies** 50:7  
**supply** 50:7 51:9  
**support** 17:23  
 18:19 33:21 44:2  
 49:1 58:10 74:22  
 85:12 86:3 93:6  
 104:15 105:17  
 116:14 122:14  
**supported** 98:22  
 123:14,15  
**supportive** 95:25  
**supports** 44:16  
 48:4 85:21 87:24  
 116:3  
**supposed** 15:22  
 31:3 73:16  
**Surfrider** 54:20,  
 25 57:1 61:22  
 111:1  
**surrounding**  
 46:23 99:7  
**survey** 93:24  
**sustainability**  
 31:22 32:8 50:18  
 115:25 117:25  
**sustainable** 32:5,  
 12,19,25 33:6,16  
 34:6 57:9  
**Sutton** 113:8  
**swath** 55:17  
**swathes** 29:1  
**sweep** 125:10  
**sweeping** 112:17  
**switch** 43:1 44:7  
 52:18 61:4 80:9  
 104:23  
**synthetic** 103:23  
**system** 24:7,9  
 32:21 34:14 35:22  
 36:9,17 38:23  
 48:4,6,12 49:14  
 55:24 59:13 68:24  
 80:3 90:14 96:18  
 109:3  
**systemic** 17:24  
 19:4  
**systems** 29:24  
 30:8 34:19 37:23  
 45:7,9,19 55:6  
 57:5 100:22  


---

**T**

---

**tackling** 27:22  
**takeout** 35:7  
**taking** 76:20 78:6  
 79:5  
**talked** 114:1  
**talking** 113:25  
**tank** 40:4  
**target** 12:24  
 58:18,19  
**targets** 55:22  
 101:15

**taxpayers** 41:5  
97:4  
**team** 27:19  
**technical** 32:10  
85:2 92:17  
**technologies**  
19:15,20 20:7  
23:15,25 30:18  
47:17 54:8 56:16,  
18 62:14,18  
63:10,14,21 64:11  
65:6 67:13,16,20  
72:17 74:9 78:16,  
25 81:12,17 82:12  
112:21 121:9  
126:17  
**technology** 54:1  
62:5,8 68:6 79:4  
82:19 127:19  
**telling** 35:5  
**temperature**  
104:9  
**ten** 32:25 37:25  
79:20  
**tenfold** 38:11  
**Tennessee** 70:19  
71:10  
**tens** 98:21  
**Teri** 13:17  
**term** 17:2,7 47:7  
122:10,13,20  
123:1,3 126:7  
**terms** 36:1 37:21  
63:11 83:4 84:6  
86:2 87:23 122:17  
**terrifying** 120:14  
**Terry** 89:15  
**test** 11:3 51:22  
125:3  
**tested** 125:9  
**testified** 15:7  
**testing** 124:21  
**Tevin** 21:15 27:9  
127:13  
**text** 26:16  
**texts** 10:14  
**theme** 12:3  
**theory** 20:1  
**thermoformed**  
38:10  
**thick** 73:9  
**thicker** 77:22,23  
118:7  
**thin** 36:15  
**thing** 17:13 38:4  
70:8 76:24 94:22  
**things** 19:11  
22:17 28:15 49:17  
82:22  
**third-party**  
109:11,18  
**Thirdly** 41:7  
**thirds** 116:24  
**Thomas** 104:24,  
25  
**thought** 36:3 80:6  
**thoughtful** 13:20  
24:22  
**thoughtfully-**  
**negotiated** 72:6  
**thousands** 18:19,  
23 98:21 99:25  
**threat** 101:25  
**threaten** 40:4  
47:9 63:20 112:15  
120:24 121:1  
126:8  
**threatens** 20:11  
**threats** 20:2  
33:24  
**threshold** 83:23  
84:11 118:4  
**thresholds** 54:4  
86:17 90:25  
**throw** 103:13  
**thrown** 111:14  
**thwart** 40:8  
**tighten** 23:23  
**tightened** 18:22  
**time** 12:20,25 18:8  
19:1 22:16 24:10  
31:12 33:1 39:1  
41:17 46:5 53:11  
58:24 70:2 74:3  
75:25 76:1 89:4  
92:5 94:24 95:13  
98:7 105:17 106:2  
108:24 114:14  
115:12 124:24  
125:16  
**time-bound** 21:3  
**time-limited**  
45:15  
**timeline** 41:7  
57:25  
**times** 15:7 56:23  
71:18 81:19  
107:21  
**timing** 13:3  
**tinkering** 32:20  
**tiny** 99:6  
**today** 8:2,17 9:25  
11:12 12:7,22  
13:11 15:12 19:11  
28:12 31:12 34:21  
35:18 39:11,15,19  
43:11 44:1 45:4  
50:14 52:24 55:5  
67:12,14 69:20  
74:10 75:14 82:24  
105:9 111:3  
113:25 114:10  
115:12 119:17  
121:20 127:18  
**today's** 6:7 7:14,  
20,23 8:20 9:8,12  
10:19 119:6,8  
127:10  
**told** 78:18 91:7,15  
**Tom** 75:10  
**ton** 66:6,8  
**tons** 89:19,21  
100:19 126:2  
**tools** 51:25  
**top** 106:7 112:13,  
23  
**topic** 9:17 57:23  
88:17  
**total** 9:16 96:22  
**totally** 18:2  
**touch** 28:13 29:16  
82:24  
**touched** 46:18  
47:7  
**town** 111:21  
**toxic** 21:12 30:19  
31:17 47:8 53:7  
62:19 64:16 65:2,  
3 72:25 79:9  
112:14 116:17  
117:10 120:25  
126:7  
**toxicity** 103:25  
123:25  
**trade** 11:25 89:16  
**traditional** 83:15  
**traffic** 7:10  
**trail** 112:7  
**transactions**  
87:4  
**transcribe** 6:12  
**transform** 33:7  
**transformation**  
32:18  
**transition** 21:25  
56:1  
**transitioned**  
23:14

**transparency**58:8 59:24,25  
69:7**transparent** 48:5**transportation**

65:9 97:22

**transported**

65:10

**trash** 75:19,2576:6 99:6,12  
112:6**travel** 57:18**trays** 35:16 38:10**treat** 117:18**treated** 49:10**treatment** 68:16**trees** 52:7**tremendous** 92:6**trend** 127:17**trending** 26:11**trip** 64:7 99:4**truck** 46:24 71:19

120:15 125:25

**truck's** 111:10**true** 37:2 82:6

123:24

**Truelove** 121:17,

18

**Trump** 17:3**trust** 14:12,21**Tuesday** 6:1**turn** 113:14**turning** 77:10**type** 23:15,22

42:16 94:21 97:25

**types** 24:19 57:681:5,8,12 97:8  
103:12 124:19**typical** 71:5**typically** 29:690:23 102:19  
105:9 121:25

---

**U**

---

**UC** 98:20 110:25

125:21

**UCS** 125:23**ultimately** 13:7

75:7 91:22 92:8

**unable** 58:14,16**unacceptable**

62:18 65:24

**uncertainty**

41:20,21 52:10

**unclear** 50:24

122:12

**uncritically** 36:4**undefined** 122:12**underfunded**

55:19

**undermine** 20:1143:5 71:15 72:22  
75:7 87:19**undermines**

53:14

**undermining**

40:3

**underscore**

53:12

**understand** 19:3,5 57:25 87:14  
101:3 110:9**understanding**

57:20 104:6

**understood**

43:17

**undertake** 91:21**undo** 82:11**unfair** 55:20**uniform** 68:11

69:2 85:22

**unintended**

20:19

**unintentionally**

71:15

**unique** 13:2216:21 96:15  
106:19**unit** 7:14 49:15**United** 47:2**universe** 85:10

109:21

**unlawful** 40:2

67:25 75:7

**unlawfully** 47:12

126:11

**unlined** 34:10,17**unmet** 97:7**unmute** 9:22 10:539:8 44:10 46:11  
50:2 52:20 54:18  
59:3 92:16 93:1  
95:17 98:13  
100:9,11 119:14,  
24 121:16 125:19  
127:3**unnecessarily**

20:21 102:19

**unnecessary**

40:2 94:19 122:21

**unquote** 114:15**unsuitable** 34:17**unsupported**

122:12

**unwarranted**

26:21

**update** 26:4**updated** 82:21**updates** 26:9**uphold** 62:15

64:12 87:21

**upholds** 46:7**uplift** 21:19 71:1**upstream** 51:6,11**urge** 20:5 21:923:23 31:13 32:14  
42:18 45:12,21  
51:22 72:15 75:3  
85:13 87:9 99:14,  
17,22 116:14  
117:13 121:7  
127:20**urges** 26:24

86:14,23 87:16

**urging** 44:2**usable** 64:3**USDA** 10:16 14:717:10 20:18 28:23  
77:15 99:23**USDA-  
REGULATED**

10:11

**users** 103:11

113:24 114:6

**utilize** 79:3

---

**V**

---

**vague** 19:1877:20 78:2 107:20  
118:6**validates** 116:19**Valley** 22:2 75:11,  
15 79:18**valuables** 7:1**variety** 115:2**vary** 37:18**vast** 35:1 36:5**vegetarian** 32:1**vehement** 12:6**verbal** 89:24**verification** 21:1  
109:12,18

- verified** 124:2
- Vermont** 120:8
- version** 26:15  
40:1 69:23 70:6  
77:2
- versions** 43:21  
74:16
- versus** 36:7 38:1  
83:5,8
- vestibule** 7:8
- viability** 36:2
- viable** 34:25  
35:14,23 107:23
- view** 63:18  
111:20,25
- views** 55:1
- violation** 22:23
- virgin** 19:23 64:2  
66:8 111:5
- virtually** 13:12
- virtue** 36:4
- visible** 102:10
- visiting** 111:17
- voice** 45:6
- voices** 32:11 37:3
- volume** 40:17,23  
41:14 102:3
- voluminous**  
41:18
- volunteer** 76:3
- Voorhees** 95:18,  
20,21
- vulnerable**  
115:23
- 
- W**
- 
- wait** 48:23
- waiting** 42:23  
118:24
- wanted** 17:20  
54:12 97:12,18  
105:1,4,10,12  
106:6 109:4,20  
110:8 115:10,19  
121:20
- wanting** 17:23
- ware** 34:18 35:17,  
25 36:16 40:10  
50:11 55:8 58:5  
83:1 101:15 115:7  
116:5,10,16
- waste** 11:21 13:5  
15:5,19,24 16:7,9,  
11 19:16,25 20:1,  
13,22 21:5,12  
34:20 44:17 46:13  
53:18,19,24 54:5  
55:11 56:6,8,11,  
19 59:6 61:22  
62:11 63:1,2,22,  
25 64:5 65:7,10,  
11,17 67:1,17,21  
68:2,4 69:3,4,7  
74:9 76:8,9 78:7,9  
79:6,9,11,14,25  
80:2,5,11,12,15,  
23 82:11,12 93:4  
96:3 101:9 104:19  
116:20 120:14  
121:25 124:11
- wasteful** 19:2
- wastes** 103:15
- water** 30:19 34:16  
72:14,25 104:3
- waterways** 113:4
- wave** 81:23
- waving** 42:10
- ways** 72:24
- weak** 68:22 73:15  
74:2 76:18
- weaken** 99:17
- weakened** 19:12  
47:4
- weaker** 81:16
- web** 57:24 58:3
- Weber** 89:15
- week** 73:10
- weekly** 76:3
- weight** 70:2 71:25
- weird** 105:2
- Weiss** 120:1,4,5
- welcomes** 7:19  
8:18 9:5
- well-being** 18:17
- well-crafted**  
25:19
- well-positioned**  
50:10
- Wellness** 22:1  
27:8,17
- West** 59:5 75:24
- wet** 36:15
- wide** 55:17 115:2
- wider** 81:16
- wildfire** 73:11
- wildfires** 73:8
- willingness**  
14:21
- window** 6:19
- wished** 34:14
- wishes** 126:25
- withdrawing**  
74:23
- woefully** 60:5
- Wolfrum** 43:3
- women** 22:1 27:8,  
17 28:2
- woods** 120:8
- word** 81:20
- words** 15:25  
122:7
- work** 10:10 12:5,  
17 14:21 24:23  
25:14 26:24 33:17  
39:22 51:1 55:3  
58:3 66:24 72:13  
75:16 87:10 91:15  
98:19 101:1  
104:25 105:5,21  
112:9 115:25
- worked** 69:17  
100:1 115:23  
118:11
- worker** 64:22
- working** 11:20  
13:4,10 19:5  
32:22 34:6 61:9  
70:18,19 85:6  
98:8 100:25  
109:5,18
- works** 18:15  
27:19
- workshop** 8:11,  
13 15:8 51:15
- workshops** 57:23
- world** 61:10 68:11  
90:16 118:9  
124:10
- world's** 13:13
- world-leading**  
116:4
- worried** 118:7
- worry** 99:24
- worrying** 29:4
- worse** 31:11  
72:23 73:17 77:2  
79:5
- worsening** 24:10
- worth** 68:9 111:10
- worthy** 29:24
- writing** 39:19  
52:15 117:7
- written** 9:23 11:9,  
10 12:21 13:2  
22:18,20 27:1  
39:9 40:13 45:3

48:24 55:15 61:18  
67:8 68:15 70:4  
72:7 75:23 89:22  
90:1 93:12 96:6  
119:15,16 122:8  
125:16

---

**Y**

---

**year** 12:16 25:5  
26:3 28:9 41:9  
86:4 89:21 107:12

**year's** 24:23  
26:15

**years** 17:22 26:7  
28:6 32:25 36:25  
37:9,25 38:2 70:2,  
20 75:23 79:20  
86:4 107:4 112:3  
113:14,19 114:1  
115:24

---

**Z**

---

**zero-waste** 61:10

**Zoe** 27:6

**Zoom** 6:18,19  
9:21 10:2,3 39:7  
42:23 43:1 44:6,7  
52:17 89:9 92:11  
98:15 100:7,8  
119:13,21,24  
125:18 126:24  
127:2,5