

## REQUEST FOR APPROVAL

**To:** Rachel Machi Wagoner  
Director

**From:** Matt Henigan  
Deputy Director, Materials Management and Local Assistance  
Division

**Request Date:** August 25, 2021

**Decision Subject:** Consideration of CARE Documents Submitted June 30, 2021

**Action By:** August 30, 2021

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### **Summary of Request**

This Request for Approval presents Materials Management and Local Assistance Division staff's (staff) analysis and recommendation regarding CARE's proposed system of differential assessments and Convenient Collection for Flooring Professionals Final Report and Implementation Plan as required by the passage of Assembly Bill 729 (Chu, Chapter 680, Statutes of 2019) and CalRecycle's November 19, 2019, Request for Approval regarding Chapter 0 of CARE's California Carpet Stewardship Plan 2018-2022, respectively.

### **Staff Analysis**

#### **Proposed System of Differential Assessments**

Requirement: Establish a system of differential assessments

Result: Partially met requirement

**Table 1. CARE's Proposed System of Differential Assessments**

<b>Basis</b>	<b>Assessment for carpet with greater than or equal to 10 percent postconsumer content</b>	<b>Assessment for carpet with less than 10 percent postconsumer content</b>
Broadloom	\$0.33 per square yard	\$0.35 per square yard
Carpet Tile	\$0.48 per square yard	\$0.50 per square yard

**Table 2. System of Differential Assessments Options Considered by CARE**

<b>Basis Options</b>	<b>Potential Number of Differential Assessments</b>
Primary Face Fiber Type	4
Residential versus Commercial	2
Broadloom versus Tile	2
Backing System	8
Residential versus Commercial and Broadloom versus Tile	4
Broadloom versus Tile and Primary Face Fiber Type	8
Residential versus Commercial and Broadloom versus Tile and Primary Face Fiber Type	16
Residential versus Commercial and Broadloom versus Tile and Backing System	32
Residential versus Commercial and Broadloom versus Tile and Primary Face Fiber Type	128

**Table 3. CARE's Subsidies Paid per Square Yard to Recycle**

	<b>Broadloom-PET</b>	<b>Broadloom-Nylon 6</b>	<b>Broadloom-Nylon 6,6</b>	<b>Broadloom-PP</b>	<b>Tile- All</b>
<b>Total subsidies per square yard to recycle</b>	\$1.50	\$1.50	\$1.16	\$0.75	\$2.06
<b>Relative subsidy paid per square yard</b>	0%	0%	-23%	-50%	37%

Public Resources Code (PRC) section 42972(c)(1) requires CARE to establish, as part of its plan, "...a system of differential assessments that takes into account the financial burden that a particular carpet material has on the stewardship program, and the amount of postconsumer recycled content contained in a particular carpet. Based on market history and modeling, if a certain carpet material requires a higher subsidy to incentivize use in the marketplace, then that material shall have a proportionally higher assessment assigned to it." CARE's proposed system of differential assessments is therefore an amendment to its California Carpet Stewardship Plan 2018-2022 (2018-2022 Plan, see Attachment 1).

CARE submitted its proposed system of differential assessments (see Table 1 and Attachment 2) to CalRecycle on June 29, 2021. CARE developed its proposal by preparing working definitions, constructing models to evaluate assessment options and

impacts, and seeking feedback from retailers, wholesalers, and other stakeholders to develop a proposed system of differential assessments that it considers practical and scalable. In addition to seeking to comply with the statutory requirements, CARE established guiding principles to aid in the development of the proposed system of differential assessments, which include increasing its recycling rate, designing an understandable system, minimizing burden on retailers, and validating conclusions with supporting data.

CARE's analysis considered various differential assessment options (see Table 2), including product categories (broadloom and tile), composition (primary face fiber types and backing systems), and market outlet (residential and commercial), as well as combinations of those options (e.g., broadloom, tile, and primary face fiber type). CARE then evaluated the assessment options to determine which require the highest subsidies to incentivize use in the marketplace (see Table 3). CARE's analysis found that broadloom requires less subsidies per square yard to recycle and has a lesser financial burden on the program than tile. Based on this analysis, and consistent with the guiding principles CARE developed (e.g., minimize burden on retailers, increase recycling rate), CARE proposes a system of differential assessments based on whether the carpet is broadloom or tile. CARE proposes an assessment of \$0.48 per square yard for carpet tile with 10 percent or more postconsumer content (37 percent higher than the existing \$0.35 per square yard assessment), and \$0.50 per square yard for tile with less than 10 percent postconsumer content. CARE proposes an assessment of \$0.33 per square yard for broadloom with 10 percent or more postconsumer content, and \$0.35 per square yard for broadloom with less than 10 percent postconsumer content, which is the amount of the current assessment for all carpet. CARE determined that further differentiation of the broadloom and tile categories (e.g., residential vs. commercial) was not feasible due to a lack of data and inconsistencies with existing industry business practices, which would result in increased levels of subjectivity and complexity for mills and retailers.

In April 2021, CARE enacted a tile pilot program to increase total potential subsidies for carpet tile from \$0.15 to \$0.35 per pound in an attempt to address the historically low tile recycling rate in CARE's program. However, the term of CARE's tile pilot program concludes at the end of September 2021, so it is unclear if carpet tile will continue to have the highest financial burden on the program on an ongoing basis. If CARE terminates the tile pilot program, the financial burden of carpet tile on the program would be reduced, and assessments may need to be adjusted.

CARE evaluated the financial burden of the four face fiber types that have historically represented the majority of carpet sales in California: nylon 6, nylon 6,6, PET, and polypropylene. CARE's analysis concluded that nylon 6,6 carpets cost the program 23 percent less and polypropylene carpets cost the program 50 percent less in subsidies paid per square yard compared to PET and nylon 6 carpets. CARE stated that the sales volumes of nylon 6,6 and polypropylene carpets are low (approximately 11 percent of

estimated 2020 carpet sales, compared to carpet tile representing 20.7 percent of carpet sales), and therefore, an additional differential assessment based on the face fiber type was not warranted. However, the statute does not specify that if sales volume is low that CARE may assign the same assessment to materials that have a different financial burden on the program. Rather, the law obligates CARE to charge a proportionally higher assessment for materials that require a higher subsidy to incentivize use in the marketplace. Moreover, PET and nylon 6 subsidies were adjusted in 2020 when CARE implemented its COVID-19 Action Plan, which led to these two fiber types receiving the same subsidies per square yard, and therefore, having the same financial burden on the program according to CARE's analysis. Due to the subsidies for PET and nylon 6 reaching parity, CARE proposes the same assessment amount for all broadloom carpet.

CARE took into account the amount of postconsumer content contained in carpets by proposing to reduce the assessment by \$0.02 per square yard on carpet with 10 percent or more postconsumer content as a percent of the weight of a square yard of the product. CARE stated that it set the \$0.02 discount in order to not create an unfair advantage in the marketplace for products in the same category that directly compete against one another. The statutory requirement to establish a system of differential assessments suggests that the Legislature intended for certain carpet materials to have an advantage over other carpet materials in terms of assessment level, but wanted to ensure that the advantage created is not "unfair." If the amounts of the differential assessment are set at particular levels based on market history and modeling, any advantage that may be created between carpet materials would not be unfair, but rather equitable based on the cost to incentivize use in the marketplace. As a result, CARE has flexibility to increase the \$0.02 discount in order to financially incentivize consumers to select carpets with more postconsumer content. Additionally, while staff consider 10 percent to be a low threshold, the statute does not specify how postconsumer content must be taken into account, and CARE set the 10 percent threshold consistent with the current version of *NSF International Standard/American National Standard 140: Sustainability Assessment for Carpet* (NSF-140). Staff note that the NSF-140 Joint Committee is currently in the process of determining whether the standard should be updated to require carpets to contain 15 percent or more postconsumer content to be certified at the platinum level. CARE should consider increasing the postconsumer content threshold to 15 percent and continue to increase the threshold over time to encourage carpet mills to utilize higher levels of postconsumer content in their products. While CalRecycle and the Department of General Services recommended increasing the NSF-140 standard to 15 percent or more postconsumer comment, some manufacturers have expressed concern about raising the NSF-140 platinum level requirement for a variety of reasons, including difficulty in increasing postconsumer content while simultaneously decreasing the total weight of carpet.

CARE based its proposed system of differential assessments on current market conditions and subsidies and did not set them based on face fiber type; however, market conditions are dynamic and many of CARE's subsidies are pilot subsidies subject to change. CARE's proposal lacks a necessary explanation of the process and frequency that it will review market history and modeling, including evaluating its program subsidies as they change over time, to determine when modifications to the assessments are warranted. While the proposed system of differential assessments offers a less complex system that may minimize the impact on retailers and wholesalers compared to many of the alternative approaches CARE evaluated, the system must be regularly reevaluated and modified over time. CARE is obligated under the law to consult with retailers and wholesalers in the development of the plan in order to minimize impacts; however, this does not imply that CARE can disregard other statutory requirements if there is an impact on retailers. Rather, it recognizes that there will inherently be impacts on entities that sell carpet, and through the act of consulting, CARE can design a system that minimizes the impacts. Therefore, CARE cannot use the retailer consultation requirement as justification for maintaining a system of differential assessments that is not consistent with the financial burden the carpet materials place on the program. To ensure that retailers and wholesalers are not burdened by the system of differential assessments, the statute should be amended to require differential assessments at the manufacturer level only. If manufacturers alone were required to directly pay more for producing carpets that are difficult and expensive to recycle, manufacturers may be more inclined to design carpets to be more recyclable.

CARE recommended delaying implementation of the system of differential assessments until its new plan goes into effect on January 1, 2023. However, CARE did not provide a robust rationale explaining why the system of differential assessments cannot be implemented sooner. The requirement to establish a system of differential assessments became effective on January 1, 2020, and CARE has had ample time to develop the proposal, including consulting with retailers, wholesalers, and other stakeholders. CARE's 2018-2022 Plan states that a minimum of six months is needed to implement a system of differential assessments. Therefore, staff recommend that CARE implement the proposed system of differential assessments on or before April 1, 2022 (approximately seven months from signature of this Request for Approval [RFA]).

Based on analysis of CARE's proposed system of differential assessments, staff found that CARE's proposal lacks the following:

- 1) An explanation of the process and frequency to review and update the differential assessment amounts and basis as market conditions and subsidies change.
- 2) Sufficient justification for delaying implementation of the proposed system of differential assessments until January 1, 2023.

- 3) Ample justification for not proposing a lower assessment for polypropylene and nylon 6,6 carpet materials to account for the lower financial burden those materials have on the program.

### **Convenient Collection for Flooring Professionals Final Report & Implementation Plan**

Requirement: Demonstrate how the convenience goals contained in CARE's 2018-2022 Plan are consistent with the results of Cascadia Consulting Group's (Cascadia) Convenient Collection Study or revise the goals to be consistent with the study, including developing a convenience goal that provides collection convenience to flooring installers and retailers.

Result: Did not meet requirement

In CalRecycle's November 19, 2019, RFA (see Attachment 3), CalRecycle required CARE to demonstrate how its convenience goals are consistent with Cascadia's Convenient Collection Study (see Attachment 4) or revise its goals to be consistent with the study, including developing a convenience goal that provides collection convenience to flooring installers and retailers. CARE submitted its Convenient Collection for Flooring Professionals Final Report and Implementation Plan (Convenient Collection Report, see Attachment 5) to CalRecycle pursuant to this requirement.

Cascadia's Convenient Collection Study concluded that proximity, access, cost, and ease are the most important convenience factors that are considered in determining whether or not to recycle carpet. The Convenient Collection Report describes CARE's approach to addressing each of these convenience factors, predominantly reiterating strategies CARE is already implementing to offer collection convenience to California residents, including flooring installers and retailers. For example, CARE has been continually working toward its 2018-2022 Plan goals to establish at least one public carpet drop-off site in every county, and at least one public drop-off site per 500,000 people. CARE needs 38 more sites (as of April 2021) to meet its current convenience goals. Additionally, CARE began utilizing geo-targeted mapping to try to establish new collection sites near flooring retailers and installers, and is recruiting supply houses, wholesalers, and regional distribution centers to offer carpet collection to flooring professionals. CARE proposed one new commitment in its report that will be effective January 1, 2023, "a requirement that new Public Access [drop-off site] locations desiring to have access to CARE's full suite of business and recycling enhancements offer a minimum 20 [percent] discounted recycling rate for clean, source separated carpet/pad." However, CARE did not propose any new goals related to its ongoing efforts to provide convenience to flooring professionals and retailers.

While Cascadia's Convenient Collection Study identified cost as an important factor to all audiences surveyed in determining whether to recycle carpet, CARE's requirement that new public sites offer a 20 percent discount for carpet is not specific to flooring

installers and retailers. Additionally, the cost discount will only apply to a limited number of public sites that CARE recruits after January 1, 2023, that want access to CARE's full suite of business enhancements. This new commitment is not likely to result in meaningful increases in program convenience since public drop-off sites only account for approximately 12 percent of total carpet collections, and the majority of the new sites CARE needs to establish to meet its convenience goals will be in Los Angeles County. CARE also does not provide an explanation of why a 20 percent discount was proposed, rather than a higher discount, or free or incentivized drop-off. Furthermore, CARE does not report to CalRecycle the sites that have access to its full suite of business enhancements, or the general and carpet-specific tipping fees for its drop-off sites, so CalRecycle does not have a mechanism to ensure CARE adheres to its commitment.

CARE did not propose any quantifiable goals for the private collection network. As of the end of 2020, there were about 242 private sites in California, generally at carpet retailers. Private sites collect approximately 88 percent of carpet processed by the program. Private collector/sorter entrepreneurs receive subsidies from CARE and may charge a fee to collect carpet from generators that include flooring contractors serving the multi-family sector, large commercial sector, and installation contractors for "Big Box" retailers such as Home Depot and Lowe's. The private collection network is not open to the public.

Although CARE did not set new goals to increase convenience for flooring installers and retailers, PRC section 42972.2 grants CalRecycle the authority to review and adjust program goals, which may include convenience goals.

Based on analysis of CARE's Convenient Collection Report, staff found that CARE's report lacks the following:

- 1) Goals regarding the convenience (e.g., proximity, access, cost, and ease) that the public and private collection network will provide to flooring installers and retailers. CARE's convenience goals are exclusively applicable to the public collection network and exclude the private collection network that serves a number of retailers and flooring professionals. The private collection network is responsible for collecting approximately 88% of the carpet that flows into the program.
- 2) Cost effectiveness goals for public sites in operation prior to January 1, 2023.
- 3) A commitment to provide CalRecycle the data necessary to verify CARE adheres to its requirement that new sites offer a 20 percent discount.

### **Analysis of Carpet Discards Formula**

Requirement: Perform a Discards Study

Result: In progress

In its 2018-2022 Plan, CARE committed to conducting a Discards Study to reconcile the difference between its discards formula estimation of annually discarded postconsumer carpet (322 million pounds in 2018) and the department's statewide waste characterization study data (1.3 billion pounds in 2018). CARE commissioned Cascadia to conduct the Discards Study, which is still ongoing. On June 29, 2021, CARE submitted an interim report (see Attachment 6) to update the department regarding its work to analyze potential revisions to its discards formula. In the interim report, Cascadia validated the carpet sales and the average weight of carpet parameters, and identified that additional work is needed to improve the estimated replacement, deselection, and demolition rates. CARE and Cascadia intend to collect and analyze additional data, and further assess modified discards formula approaches by late fall of 2021, and then will submit a modified discards formula to CalRecycle.

### **Report on Processing Capacity of Carpet Recyclers**

Requirement: Complete a capacity study; initiate implementation of recommended program adjustments; and set 2022 goal based on study results.

Result: In progress

CARE committed to complete a study on the processing capacity of carpet recyclers, implement recommended program adjustments, and set a 2022 processor capacity goal in its 2018-2022 Plan. On June 29, 2021, CARE reported to the department that it completed its capacity study, but has not yet provided its 2022 processor capacity goal. The study evaluated the estimated volume of carpet discards that can be processed by participating processors, and included recommendations for capacity expansion to support CARE's ability to achieve recycling rate goals, which are being implemented. Staff will review CARE's compliance with its commitment to set a 2022 processor capacity goal and adherence to the goal in the fall of 2023 during its review of CARE's 2022 Annual Report.

### **CARE Phase 2 Economic Analysis of Carpet Recycling**

Requirement: Provide a complete independent economic analysis that accounts for commodity revenues and justifies subsidies. Demonstrate how the assessment level will provide the overall funding necessary to achieve the recycling rate goals in statute and CARE's 2018-2022 Plan. Validate the Subsidy Justification Model.

Result: Met requirement

CalRecycle's November 19, 2019, RFA required CARE to provide a complete independent economic analysis that accounts for commodity revenues and justifies subsidies, demonstrate how the assessment level will provide the overall funding necessary to achieve the recycling rate goals in statute and CARE's 2018-2022 Plan, and validate the Subsidy Justification Model. CARE contracted with Crowe LLP (Crowe) to conduct the economic analysis. Crowe determined that CARE's subsidies, combined



with commodity revenues, “provide an adequate incentive to meet program objectives.” Crowe also validated CARE’s Subsidy Justification Model by comparing the results of its survey with the subsidies recommended by the model.

Crowe evaluated six different scenarios to determine whether the assessment level of \$0.35 per square yard will provide the overall funding necessary to achieve the recycling rate goals in statute and CARE’s 2018-2022 Plan and determined that the assessment would be sufficient to fund the program to achieve at least a 26 percent recycling rate in 2021 and 28 percent in 2022.

### **Highest Recyclability Update**

Requirement: Review and expand definition of highest recyclability

Result: Met requirement

CARE committed in its Chapter 0 Report to review and expand its definition of highest recyclability. CARE submitted a Highest Recyclability Update (see Attachment 7) on June 30, 2021, which included a highest recyclability definition, as well as a commitment to review the Highest Recyclability Table with a committee by the end of 2021 and annually thereafter . CARE will share its results with the department and the California Carpet Stewardship Program Advisory Committee.

### **Post-Consumer Carpet: Barriers and Opportunities for Reuse**

Requirement: Conduct a reuse study

Result: Met requirement

Per its 2018-2022 Plan, CARE committed to conducting a reuse study to better understand potential opportunities and barriers for increasing carpet reuse. CARE contracted with Abbe and Associates LLC to perform the Reuse Study (see Attachment 8). Based on the study findings, CARE submitted a Reuse Study Action Plan (see Attachment 9) that describes actions it intends to implement in 2021 and 2022 to increase carpet reuse. CARE’s planned actions include continuing to provide expanded incentive payments for reuse and expanding infrastructure and marketing support for existing reuse outlets. Staff will review CARE’s reuse activities and performance, consistent with its Reuse Study Action Plan, in future annual reports.

### **Advisory Committee Comments and Recommendations**

CARE submitted draft documents to the California Carpet Stewardship Program Advisory Committee (Advisory Committee) on May 3, 2021. The Advisory Committee reviewed these drafts in two meetings held on May 11, 2021, and May, 12, 2021, and provided written comments and recommendations regarding the documents (see Attachment 10), summarized below.

#### Advisory Committee Recommendations Regarding Differential Assessments:

1. CARE should describe how and when it will update differential assessments when subsidies change.
2. CARE should implement differential assessments prior to January 1, 2023.
3. CARE should increase the postconsumer content threshold above 10% and provide a greater assessment discount for carpets containing postconsumer content.

#### Advisory Committee Recommendations Regarding Convenient Collection for Flooring Professionals:

1. CARE should implement an installer monetary incentive pilot program.
2. CARE should conduct a study with property managers to determine if their carpet tear-out and replacement activities for new occupants could support the program, for example, by incentivizing contractors to remove carpet before other materials, such as drywall.

#### Advisory Committee Recommendations Regarding Highest Recyclability:

1. CARE should make specified changes (e.g., describe the composition and add a member of the Advisory Committee to CARE's Highest Recyclability Committee) to the Highest Recyclability Update document.
2. CARE should make specified changes (e.g., include mixed fiber, re-evaluate commercial broadloom) to the Highest Recyclability Criteria when reevaluating in 2021.

CARE provided written responses (see Attachment 11) to the Advisory Committee's comments and recommendations, as required by PRC section 42972.1(c).

#### **Stakeholder Feedback**

CalRecycle solicited public comments on CARE's documents from July 12, 2021, through July 19, 2021, and received one letter from the California Product Stewardship Council (CPSC), which staff considered in its evaluation of the documents. CPSC recommended disapproval of all the documents submitted by CARE. Regarding CARE's differential assessments proposal and its convenient collection report, the two documents for which the director will be issuing determinations in this RFA, CPSC indicated that CARE did not justify differentiating assessments by the suggested carpet categories (i.e., broadloom and tile), and that CARE did not provide goals or metrics for enhancing convenient collection for flooring professionals, respectively.

#### **Summary of Staff Analysis**

CARE's proposed system of differential assessments provides a starting point to implement different assessments for carpets based on the current financial burdens on the program, which has the potential to be refined and improved over time. CARE's proposed system is relatively simple and therefore, less burdensome on retailers and easy for consumers to understand. However, CARE did not explain the process and

frequency it will use to review and update the differential assessments as market conditions and subsidies change. Additionally, CARE did not justify its request to delay implementation, or validate its rationale for not proposing a lower assessment for polypropylene and nylon 6,6 carpets.

CARE's Convenient Collection for Flooring Professionals Final Report and Implementation Plan reiterates many of CARE's ongoing activities to improve convenient collection in the state, including for flooring professionals. Although CARE proposed one new cost-related commitment to require new public access drop-off sites to offer a 20 percent tip fee discount, the requirement will become effective January 1, 2023, and will apply to a limited number of drop-off sites that want to take advantage of CARE's business assistance resources. Additionally, CARE does not currently report to CalRecycle the tip fees charged by participating drop-off sites for carpet or other materials that will enable staff to verify that sites established after January 1, 2023, adhere to this requirement. CARE did not propose any quantifiable goals for the private collection network, which collects approximately 88 percent of carpet processed by the program.

**Recommendations:**

Staff recommend, pursuant to Title 14 of the California Code of Regulations section 18942(b)(2), the director conditionally approve CARE's proposed system of differential assessments plan amendment, contingent upon CARE making the following revisions within 60-days:

1. CARE revises the implementation date of the proposed system of differential assessments to on or before April 1, 2022.
2. CARE establishes an annual (or more frequent) process to review and update, as needed, the differential assessment amounts as market conditions and subsidies change.
3. CARE adopts a schedule to develop a revised system of differential assessments that is inclusive of additional factors, such as type of face fiber to more accurately align the assessment levels with the financial burden various carpet materials have on the program, for inclusion in its next plan.

Staff recommend, pursuant to PRC section 42975(a), the director find CARE's Convenient Collection for Flooring Professionals Final Report and Implementation Plan has not demonstrated that CARE adhered to Requirement II of Chapter 0 of CARE's 2018-2022 Plan.

**Action:**

Based on CARE's proposed system of differential assessments and analysis in this Request for Approval, I hereby conditionally approve CARE's proposed system of differential assessments, contingent upon CARE revising and resubmitting its proposed system of differential assessments as described in the Recommendations section above. Additionally, I direct staff to bring forward a recommendation referring CARE to

the Waste Permitting, Compliance, and Mitigation Division for enforcement at any time, pursuant to PRC section 42974, if CARE does not provide the required information or adhere to its commitments.

Based on the information in CARE's Convenient Collection for Flooring Professionals Final Report and Implementation Plan and the analysis in this Request for Approval, CARE has not demonstrated that it adhered to Requirement II of Chapter 0 of CARE's 2018-2022 Plan. Therefore, pursuant to PRC section 42972.2, I direct staff to review and adjust the program goals that include, but are not limited to, convenient collection goals for flooring installers and retailers.

**Dated:** 8/27/2021

Signed by Rachel Machi Wagoner, Director

**Rachel Machi Wagoner**, Director

**Attachments:**

Documents listed below are posted to CalRecycle's website. To request documents that are referenced in this report but are not listed below, please submit a Public Records Act request (<https://www2.calrecycle.ca.gov/Forms/ContactUs/PublicRecordsRequest/>).

1. [CARE's California Carpet Stewardship Plan 2018-2022](https://www2.calrecycle.ca.gov/Forms/ContactUs/PublicRecordsRequest/), <https://carpetrecovery.org/wp-content/uploads/2020/02/Chapter0CARE20182022.pdf>
2. [CARE's Differential Assessment Approach](https://www2.calrecycle.ca.gov/Forms/ContactUs/PublicRecordsRequest/), <https://carpetrecovery.org/wp-content/uploads/2021/06/CARE-Differential-Assessment-Plan-Narrative-FINAL-6-23-21-ADA.pdf>
3. [CalRecycle November 19, 2019, Request for Approval regarding Chapter 0 of CARE's California Carpet Stewardship Plan 2018-2022](https://www2.calrecycle.ca.gov/Forms/ContactUs/PublicRecordsRequest/), <https://www2.calrecycle.ca.gov/PublicNotices/Details/3822>
4. [Cascadia Convenient Collection Study](https://www2.calrecycle.ca.gov/Forms/ContactUs/PublicRecordsRequest/), [https://carpetrecovery.org/wp-content/uploads/2019/09/CARE\\_ConvCollection\\_FINAL\\_2019\\_09\\_01.pdf](https://carpetrecovery.org/wp-content/uploads/2019/09/CARE_ConvCollection_FINAL_2019_09_01.pdf)
5. [CARE's Convenient Collection for Flooring Professionals Final Report and Implementation Plan](https://www2.calrecycle.ca.gov/Forms/ContactUs/PublicRecordsRequest/), [https://carpetrecovery.org/wp-content/uploads/2021/06/Convenient-Collection-for-Flooring-Professionals-Final-Report-to-CR\\_20210630\\_FINAL\\_ADA.SECURE.pdf](https://carpetrecovery.org/wp-content/uploads/2021/06/Convenient-Collection-for-Flooring-Professionals-Final-Report-to-CR_20210630_FINAL_ADA.SECURE.pdf)
6. [CARE and Cascadia Analysis of Carpet Discards Formula](https://www2.calrecycle.ca.gov/Forms/ContactUs/PublicRecordsRequest/), [https://carpetrecovery.org/wp-content/uploads/2021/06/CARE\\_DiscardsFormula\\_InterimRept\\_v10\\_20210628-ADA.pdf](https://carpetrecovery.org/wp-content/uploads/2021/06/CARE_DiscardsFormula_InterimRept_v10_20210628-ADA.pdf)
7. [CARE's Highest Recyclability Update](https://www2.calrecycle.ca.gov/Forms/ContactUs/PublicRecordsRequest/), <https://carpetrecovery.org/wp-content/uploads/2021/06/Highest-Recyclability-AC-6-30-21-Final-ADA.pdf>

8. [Abbe and Associates LLC Post-Consumer Carpet: Barriers and Opportunities for Reuse](https://carpetrecovery.org/wp-content/uploads/2021/06/CARE-CA-Reuse-Report-5-28-21-ADA-Final.pdf), <https://carpetrecovery.org/wp-content/uploads/2021/06/CARE-CA-Reuse-Report-5-28-21-ADA-Final.pdf>
9. [CARE's Reuse Study Action Plan](https://carpetrecovery.org/wp-content/uploads/2021/06/CARE-Reuse-Study-Action-Plan-06-28-21-FINAL-ADA.pdf), <https://carpetrecovery.org/wp-content/uploads/2021/06/CARE-Reuse-Study-Action-Plan-06-28-21-FINAL-ADA.pdf>
10. [Advisory Committee Recommendations Regarding CARE Deliverables](https://www2.calrecycle.ca.gov/PublicNotices/Documents/13348), <https://www2.calrecycle.ca.gov/PublicNotices/Documents/13348>
11. [CARE Responses to Advisory Committee Recommendations Regarding CARE Deliverables](https://www2.calrecycle.ca.gov/PublicNotices/Documents/13467), <https://www2.calrecycle.ca.gov/PublicNotices/Documents/13467>