

# Statewide Commission on Recycling Markets and Curbside Recycling Draft Meeting Notes

Date: October 20, 2021

Time: 8:00 AM – 12:30 PM

## Present:

Commissioners Cadena, Davis, Dell, Donlevy, Ferrante, Lapis, Kalpakoff, Medrano, Oseguera, Sanborn, Schneider, Skye, Toyoda, Valle, and Ward.

## Absent:

Commissioners Bouchard

## Agenda:

### Agenda Item 1: Call to Order, Roll Call, and Establishment of Quorum

Chair Sanborn brought the Commission to order. Vice Chair Valle read the roll call. Commissioner Bouchard was absent. A quorum was established.

Public comments: None

### Agenda Item 2: Review and Potential Approval of Meeting Notes

Commissioner Schneider requested the following corrections to the October 6, 2021 draft meeting notes: (1) On page 5, under the single use plastics and artificial turf 2-person committee report, Commissioner Schneider corrected the notes to say that the Millbrae City Council approved the creation of a moratorium ordinance for the application of synthetic turf instead of implying the moratorium ordinance had already passed; (2) On page 5, under the Organic Materials Renewable Technologies 2-person committee: Commissioner Schneider asked that this group investigate best practices for organics facilities, especially with respect to biomass use as a source of energy.

Commissioner Ward requested an additional change to the October 6<sup>th</sup> meeting notes. Agenda item 10 was revised to add the word “development” to the phrase “Committee on Organics Procurement” under the list of two-person committees that were created. The meeting notes were revised to read as “Committee on Organics Infrastructure Development and Procurement”.

Commissioner Ward moved to approve the meeting notes and Commissioner Skye seconded. Commissioner Medrano abstained because he did not attend the October 6<sup>th</sup> meeting. The meeting notes were unanimously approved by the Commissioners that voted.

The September 15, 2021, Committee of the Whole meeting notes were not reviewed.

Public comments: None

### **Agenda Item 3: Public Comment Review - Items Not on the Agenda**

Commissioner Oseguera said that he will respond to the public comment from Matt Maloney directly and report back to the Commission.

Chair Sanborn suggested that Shirley Freriks follow SB 54 in the California Legislature and noted that the Commission has taken up discussion on issues with packaging and producer responsibility.

Chair Sanborn stated that she posted the presentation received from Sean Levi related to printer cartridges on the Commission GoogleDrive. Commissioner Ward suggested Sean Levi's comment be referred to the committee of two on Single-use plastics and artificial turf (Commissioners Ward and Schneider). Commissioner Donlevy expressed opposition and recommended the Commission not address this issue since it's a federal and international trade issue and is outside of scope of the Commission. Commissioner Ward referenced that if a material is not recycled or recovered at a 75% or higher rate it is in the purview of the committee. Commissioner Donlevy again emphasized the topic was outside of the scope. Chair Sanborn identified that the debate was an issue of which topics are priorities of the Commission to address. Commissioner Skye stated that it is important to prioritize and remember that, although a federal issue, a resolution was adopted by the California State Legislature on international issues impacting market development of recyclables. Commissioner Dell supported Commissioner Donlevy's comment and that the Commission already had a long to do list.

Commissioner Schneider supported Commissioner Ward and Skye's comments that the topic should be addressed by the single use plastic group of two. Commissioner Schneider clarified that the single use plastic group would look at the topic from a high level and what the state of California can do with waste prevention and reuse as a subset of waste prevention before recycling. They are focusing not on individual products, but looking at the topic system-wide. Chair Sanborn referred the comment to the single-use plastics and artificial turf two-person committee (Ward, Schneider).

Chair Sanborn referred the comment from Aldous Hicks to the two-person Committee addressing Bottle Bill issues (Ward, Valle).

Chair Sanborn followed-up on the comment received at the October 6, 2021 meeting from Palo Alto. Vice Chair Valle noted it was not referred to a committee yet and

suggested that it be referred to the Market Development Committee of two (Davis, Sanborn).

Public Comments (see full comments in Appendix 1):

- Matt Maloney
- Shirley Freriks, WasteNOT Nevada County
- Sean Levi, Planet Green
- Aldous Hicks, Lasso Loop Recycling
- Comment from October 6, 2021 meeting – Paula Borges, City of Palo Alto

Chair Sanborn followed up with the Commissioners on the comment received at the October 6, 2021 meeting and inquired if the comment was referred to a committee. Vice Chair Valle noted that the public comment was not referred to a committee yet; suggesting that it be referred to the Market Development Committee of two (Davis, Sanborn). Chair Sanborn stated the Market Development Two-Person Committee will get back to the City of Palo Alto. Commissioner Ward pointed out that there is a need to reestablish trust with the public and ensure material that is placed in the recycling bin is recycled. Commissioner Ward also discussed there is a fundamental roadblock and limits on information after something is exported and it is beyond the scope of the Commission.

#### **Agenda Item 4: Presentations and Discussions around Management of Aerosol Products**

Nicholas Georges, Senior Vice President, Scientific and International Affairs with the Household and Commercial Products Association, presented on recycling empty aerosol containers.

Commissioner Ward inquired about the hazardous material in aerosol containers. Commissioner Lapis discussed whether the risk to MRF operators and fires from processing the aerosol cans is worth having them in the recycling stream. Chair Sanborn pointed out that operators still pay for insurance and the backend of the system is addressing issues created by the front end of the system. Commissioner Dell pointed out that the Commission did a detailed survey on what MRFs accept and stated that based on the survey, 44% of MRFs in California accept aerosol cans.

Commissioner Dell referenced the US EPA, 2017 report, that reported the aerosol can recycling rate was 15%. Commissioner Ward continued the discussion about risk for MRF operators and noted that they should not take the risk on behalf of the product manufacturer. Commissioner Ward suggested they consider looking at equipment for processing and underwriting the insurance of the operators who accept the products. Commissioner Oseguera pointed out that vehicle fires are not anecdotal and represent a real risk to waste management and California as a whole. Commissioner Ferrante

discussed that the material does not justify the risk to the MRF operators and pointed out that facility and vehicle fires are on the rise. Commissioner Ward pointed out the issue is similar to batteries and not just aerosol cans.

Andrew Johnstone, Fine Artist and Director of Big Picture Arts Program, presented on recycling paint aerosol containers.

Chair Sanborn pointed out that CalRecycle provides state oversight to PaintCare. Vice Chair Valle inquired if the state of California has a charge on aerosol cans. Chair Sanborn referenced an ARB program that charges a deposit for car refrigerant cans. The ARB small containers of automotive refrigerant-consumer requirements document was uploaded to the Commission GoogleDrive. Commissioner Donlevy expressed support for the suggestion for a \$1 deposit for aerosol cans, similar to used motor oil and bottle bill programs.

Mannie Cheung, Vice President with Product Care Association presented on management of aerosols in Canada.

Chair Sanborn inquired whether there is a deposit on the aerosol cans to incentivize consumers to return them correctly. Mannie Cheung responded that the fees are paid similar to the PaintCare model; as an upfront fee. The fee is in the range of \$0.20 to \$0.45 CAD for paint aerosol cans and \$0.01 to \$0.15 CAD for household hazardous waste (HHW).

Jeremy Jones, West Coast Program Manager from PaintCare, provided information about PaintCare.

Chair Sanborn suggested the HHW 2-person committee (Sanborn, Ward) continue this dialogue with PaintCare.

Vice Chair Valle left at 10am and returned at 12 pm.

The Commissioners discussed different ways to address issues posed by aerosol cans. Vice Chair Valle identified issues related to aerosols, including the aerosol can design and material composition, chemical compositions, and fire suppression. Commissioner Ward suggested Chair Sanborn and him (as the two-person Committee for) could draft information summarizing management of aerosol cans management and how they could be separated in to hazardous and nonhazardous groups. He suggested PaintCare could handle nonhazardous aerosol cans, and hazardous aerosol cans could be handled in the Extended Producer Responsibility (EPR) HHW program.

Public Comments (see full comments in Appendix 1):

- Doug Kobold

## **Agenda Item 5: OPA Presentation and Discussion**

Maria West and Christina Files from CalRecycle's Office of Public Affairs (OPA) provided an update on the outreach and education campaign, including findings from

research conducted as part of the campaign and its focus on reducing contamination. CalRecycle noted that they are waiting for SB 343 (Allen) rulemaking before educating the public on specific materials and products that will be covered by that law.

Commissioners provided feedback on CalRecycle's new public meeting format, including informational videos on SB 1383. Commissioner Lapis noted that in the virtual format, public comments are read at the end of the meeting, which allows for less dialogue around topics. Commissioner Lapis also inquired if the videos presented at the public meeting could be repackaged for local news station broadcasts.

Commissioners expressed feedback to OPA on the education and outreach campaign. Chair Sanborn expressed concern about the idea that CalRecycle does not have authority to ban any specific materials, thus statewide messaging suggesting a material should not be put in recycling bins would be a potential underground regulation. Commissioner Dell also expressed a concern that CalRecycle cannot say certain things cannot go in the recycling bin and encourages CalRecycle to message that plastic bags should go in the trash and not the recycling bin. Commissioner Lapis noted that he does not think telling people a material is unlikely to get recycled is an underground regulation and does not think it's a ban.

Commissioner Lapis requested a copy of the survey results from the research phase of CalRecycle's Education and Outreach Campaign. Commissioner Ward expressed an interest in receiving the stakeholder feedback from the rural counties.

Chair Sanborn provided feedback on the use of the phrase "trash pollution" and noted that the general consumer may not understand the phrase. Commissioner Schneider encouraged material should also be presented and translated into Mandarin.

Commissioner Oseguera expressed a concern that messaging will change with the enactment of SB 343 (Allen). Commissioner Oseguera pointed out data point that 74% of folks rely on recycling symbol for recycling. He also suggested there needs to be further outreach to help jurisdictions on messaging on contamination related to SB 1383.

Commissioners took a break from 11:00 am to 11:33 am.

Commissioner Davis discussed that the focus of the Campaign should be positive in its framing of behavior. Commissioner Davis expressed discouragement by waiting until the SB 343 (Allen) list is released because nothing will happen until for another three to four years. Commissioner Davis also suggested a focus on what goes into the recycling and composting containers, along with emphasizing nonrecyclable plastics going to the landfill.

Commissioner Dell expressed a concern that we need to "get real about recycling" and expressed that plastic bags do not go into the recycling bin. Commissioner Dell suggested CalRecycle create constructive and proactive messaging to stop contamination in recycling bins.

Commissioner Skye concurred that the messaging should be community-based and specific to the community. Commissioner Skye suggested the messaging should be active and would like to see more information about what OPA is wanting to do for next steps. Commissioner Skye requested a copy of the OPA presentation.

Commissioner Ward felt that they were losing the confusion wars and need to immediately address the confusion instead of waiting. Commissioner Ward also expressed a concern that CalRecycle is hesitant to say something as a contaminant and should be put in the disposal bin because it will hurt the recycling rate. Commissioner Ward continued discussing that placing material in a specific bin makes the sorting process more efficient.

Commissioner Medrano inquired about the stage the campaign is in and whether the Commissioners have an option to add input. Commissioner Medrano also asked for clarification on whether the Commission has the option to change the direction of the campaign or is its role to provide add input to something that has already been created and agreed upon. Commissioner Medrano stated if it's the latter, then he sees this as a futile effort. Commissioner Medrano would like to see the campaign focus on the items that are contaminants per the presentation and recognizes most individuals know what is recyclable, but not what is a contaminant for recycling. Commissioner Medrano also requested the campaign focus on general awareness of SB 1383.

Commissioner Toyoda reminded the Commission that many communities don't want plastic bags in recyclable containers, but when SB 1383 is implemented, people will be told plastic bags can be put in compost, such as in her community. Commissioner Toyoda has been told that they can pull the plastic bags out. Commissioner Toyoda stated that the messaging will be confusing that plastic bags can be put in compost and not in the recycling bin.

Chair Sanborn suggested the two-person committee of Organics contamination (Toyoda and Kalpakoff) provide feedback on this issue of plastics bags in the organics recycling stream.

Chair Sanborn suggested a discussion with CalRecycle at the Director level to discuss what can be messaged prior to the SB 343 (Allen) characterization study being published.

Commissioner Ferrante expressed a concern that the OPA presentation implied that the recycling rate would be reduced overall and thought the effect (of the campaign) was to reduce confusion for the consumer and to identify what was recyclable. Commissioner Ferrante thought that the campaign will ultimately create products that are actually recyclable. Commissioner Ferrante also pointed out that as messaging continues, need to focus on organics recycling as well.

Commissioner Schneider returned to the issue of plastic bags in the organics recycling stream. Commissioner Schneider noted that her community's program for a digester

does not want plastic bags in the collection bins, including biodegradable plastics. Commissioner Schneider emphasized that CalRecycle should work on messaging about biodegradable plastics.

Chair Sanborn requested that OPA provide a monthly update on the Campaign to the Commission. Chair Sanborn also requested that OPA present at the next Commission meeting on November 3, 2021 to continue the dialogue about the Campaign.

Commissioner Dell requested that CalRecycle make an announcement to the entire state to not bag recyclables in plastic bags. Chair Sanborn identified three data requests: (1) receive full copy of the survey, (2) Ask CalRecycle if they can make a public announcement to the entire state that people should not be bagging recyclables in plastic bags? Is that allowed and will CalRecycle do it?, and (3) Ask CalRecycle if they can make a public announcement to the entire state that people should not be bagging compostables in plastic bags? Is that allowed and will CalRecycle do it?

Commissioner Lapis noted that the third data request about compostable is related to SB 1383 which allows for plastic bags as part of organics recycling. Commissioner Oseguera clarified that SB 1383 allows plastic bags in organics collection programs if processors can handle them. Commissioner Davis expressed an interest if CalRecycle will address the concern of bagging organics. Commissioner Schneider noted that if the State stays silent on plastics in organics recycling, programs that allow for differences have to pay more money to operate and educate. After discussion, it was not confirmed that the third data request should be asked of CalRecycle.

Commissioner Kalpakoff pointed out that OPA's survey found that reported MRF contamination was 15-20% and his processor is nowhere near that number. Commissioner Kalpakoff inquired if the commission list of recyclable items identified by the Commission are going to be addressed in the outreach program. Chair Sanborn pointed out different contaminants (e.g. aerosol cans and garden hoses) in the recycling stream should be noted as a contamination and potentially harmful to the recycling system.

Commission returned discussion back to Agenda Item 4.

## **Agenda Item 6: Report Outs from All Two-Person Committees**

Commissioner Sanborn requested that two-person committees provide updates in writing prior to the upcoming meeting. Commissioner Dell requested policy recommendations be on the agenda for the next commission meeting.

The following two-person committees provided updates or comments:

Waste Reduction, Recycling, and other:

1. Waste Prevention: Schneider, Ward

Commissioner Ward stated that a written report was submitted and no additional updates at this time.

2. Bottle Bill issues: Ward, Valle

Vice chair Valle asked for clarification about two-person Committees being able to meet with legislators or legislative staff about the California Redemption Bill with concerns about potential serial meetings. Commissioner Ward also expressed the same concern. Chair Sanborn suggested the commissioners meet individually as an individual and represent their organization, but not representing the commission, and report back to the commission with information. Commissioner Ward also stated they are addressing the Lasso Bin.

3. Liaison with Oregon Department of Environmental Quality: Toyoda, Lapis

Chair Sanborn discussed that the presentation from David Allaway planned for the next meeting will be shortened or postponed.

4. Carpet and Flooring: Davis, Sanborn

Chair Sanborn said there was nothing to report out.

5. Single-use plastics and artificial turf: Schneider, Ward

Chair Sanborn confirmed there was nothing to report. Chair Sanborn noted there was public comment and encouraged commissioners to read the public comment about artificial turf. The public comment was not read.

6. Right to repair: Davis, Ward

No updates for this Committee.

7. Methane emissions reductions: Cadena, Davis

Commissioner Davis noted there is a policy recommendation posted on the Commission GoogleDrive. Commissioner Davis referenced an ARB published draft report for greenhouse gas reduction for organic waste in May 2017 and uses carbon dioxide-equivalents. Recommendation is to produce a calculator for methane as a short-lived climate pollutant. Chair Sanborn considered this a first read of the proposal.

8. Report Structure and Editing, Plus HHW, EPR & Other Items: Sanborn, Ward

No updates for this Committee.

The following two-person committees did not provide updates or comments:

Market Development

9. Construction and Demolition for Market Development Committee: Sanborn, Toyoda

10. Thermoforms: Davis, Sanborn

11. Organic Materials Renewable Technologies: Skye, Oseguera

Organics:



12. Food Waste Prevention and Rescue, Exports and Precautionary Principle: Skye, Lapis
13. Organic materials Infrastructure: Oseguera, Kalpakoff
14. Organics contamination: Kalpakoff, Toyoda
15. Organics procurement: Kalpakoff, Oseguera

Label and Media:

16. Contamination, labeling, and outreach: Dell, Valle

Public Comments (see Appendix I for full comment):

- Dianne Woelke (ArtificialTurf)
- Diana Conway (Artificial Turf)

## **Agenda Item 7: Data Review and Requests**

Chair Sanborn shared CalRecycle's response on the pending data requests to CalRecycle from last meeting. Commissioner Ward will post the document to the Commission's GoogleDrive.

Commissioner Skye addressed the request for clarification from CalRecycle on the definition of "advanced chemical recycling" being used by the Commission. Commissioner Skye requested information on how specific facilities would hypothetically be permitted in California using Fulcrum Bioenergy in Nevada and Agilent as the two hypothetical facilities. Commissioners expressed concern about spending more Commission time on advanced chemical recycling at this time. Commissioner Lapis pointed out that John Sitts from CalRecycle already provided a presentation to the Commission. Commissioner Skye recalled his data request. Commissioner Lapis recommended the Commission discuss the topic and identify specific questions for a future data request.

As previously requested, Commissioner Dell would like feedback from CalRecycle on the Commission's ability to send letters to product companies.

## **Agenda Item 8: Next Meeting and Agenda Items for Future Meetings**

The next meeting is scheduled for Wednesday, November 3, 2021 from 9:00 am – 12:00 pm.

The following will be included in the agenda for the upcoming meeting:

- Commissioner Dell requested policy recommendations from the two-person Committees be at the start of the agenda.
- Chair Sanborn stated the Oregon DEQ presentation will be removed from the agenda, and asked the two-person committee to report back.

## **Agenda Item 9: 12:25 pm (5 minutes) Meeting Summary and Closing**

The meeting was adjourned at 12:31pm.

Public Comments: None

## **Appendix 1: Public Comments**

### **Matt Maloney**

I live in a community a few miles outside of Chico CA in Nord. We currently have waste management service for garbage only. Green waste and recycling are not offered. Waste management is our only option for service and they are not willing to accommodate for recycling needs for the Nord community nor work together with us for a constructive plan to conserve the environment and not mix recyclables with common trash. Waste management has not provided an alternative for homeowners in the community despite the fact that the Nord Country School, which is located in town, has recycling services. There needs to be an effort put forth from either the Waste Management team or the Cal recycling team to accommodate for smaller communities needing to recycle. My hope in writing this request is that it does not fall on deaf ears or into a black hole suggestion box and nothing gets done. Please do your part as we are all trying to do ours in the community of Nord. Thank You

### **Shirley Freriks, WasteNOT Nevada County**

Does CA have any laws or rules about producers recycling what they offer for sale? I know we just passed the Truth in Recycling and Composable labeling (Hallelujah!) but are you contemplating further controls for them to take it back or arrange for the recycling of their products and packaging? I believe Europe has had this for years.

### **Sean Levi, Planet Green**

Attention Madam Chairwoman Heidi Sanborn: Dear State Recycling Commission, Planet Green is a cartridge re-manufacturer in Chatsworth, California. We recycle original equipment manufactured, (OEM) printer cartridges for reuse. We're asking the Recycling Commission to take action regarding the flood of non-OEM, single-use, nonrecyclable printer cartridges coming in from overseas. The print industry is a multibillion-dollar industry that is built on selling consumable printer cartridges. When printer cartridges are used and pulled from printers, they are no longer considered Electronic Waste. The U.S. printer cartridge remanufacturing industry was created as a solution from the waste generated by OEM printer cartridges. In the past, the U.S. Electronic Waste Industry and the cartridge remanufacturing industry relied on each other to close the loop on used OEM printer cartridges. Currently, the U.S. remanufacturing industry is near extinction, because of the non-OEM, single-use, non-recyclable cartridges coming in from overseas. In addition, these products have become a major problem for electronic waste companies to handle the mass volume of used

cartridges that are accumulating daily. Since there are regulations on how E-waste is handled, electronic waste companies across the country are refusing to accept printer cartridges altogether. Consumers are being left with little choice but to discard their used printer cartridges in the trash. For U.S re-manufacturers it has become difficult to acquire recyclable cartridges from Electronic Waste companies. The enormous amount of single-use non-recyclable cartridges that are mixed in with OEM used cartridges, making it cost prohibited to sort, handle, and deal with the waste. Printers and printer cartridges are not going away anytime soon. If no action is taken, our state will continue to be a dumping ground for imported non-OEM, highly unregulated, nonrecyclable, consumable plastic printer cartridges sold here in the U.S. Madam Chairwoman we would like to share our presentation regarding this issue with the commission.

## **Aldous Hicks, Lasso Loop Recycling**

Lasso seeks to Change CA & US Domestic Recycling for Good. Lasso Loop Recycling LLC (Lasso) seeks is a conversation with CalRecycle for two reasons. Firstly, to allow Lasso to apply to have its domestic recycling appliance considered for approval to return CA CRVs to householders through their Lasso domestic recycling appliance. The process could be like what was required to approve RVMs providing this service. Secondly, that CalRecycle investigate allowing Lasso to be considered for Pilot Projects in association with CA cities or counties. Lasso has submitted initial requests to CalRecycle and seeks a dialogue to enable Lasso to explain the Lasso domestic closed-loop recycling process and obtain responses to its two questions.

BACKGROUND Lasso Loop Recycling LLC (Lasso) seeks to empower householders to closed-loop recycle 100% of their valuable used containers and used materials that are closed-loop recyclable. These include used PET, HDPE, brown glass, green glass, clear glass, steel, and aluminum containers. Lasso proposes to achieve this outcome via the Lasso domestic recycling appliance. As with other domestic appliances, for example a washing machine or a dishwasher, a Lasso appliance will deliver convenience and time saving benefits to householders. Secondly it will guarantee householders that it will close-loop recycle 100% of all items accepted by the Lasso appliance. Thirdly, it will provide information of the householders reduced CO2e emissions. Fourthly, if approved by CalRecycle, your Lasso proposes to return your CA CRVs without leaving your home. Fifthly and subject to assumptions about the future sale price of Lasso closed-loop recyclable products - rPET, rHDPE, re-melt furnace ready (to specification) color-pure brown glass cullet, colour-pure green glass cullet, colour-pure clear glass cullet, steel and aluminium shreds - Lasso proposes to return cash to householders for their closed-loop recycling efforts net of collection and logistic costs. Sixthly, deliver EPR to FMCG companies at a fee per container for their containers which have been closed-loop recycled by Lasso operating households. Seventhly, and subject to agreements with manufacturers who used the Lasso closed-loop recyclable products and future CA State regulations, allow householders to earn Green Credits. There are other advantages of the Lasso domestic recycling system. Most importantly Lassos will allow Californian households to contribute to benefit from the planets must have circular economy. Lasso seeks the assistance of the Commission, CalRecycle and the Californian State Government to change recycling for good!

## **Dianne Woelke, Safe Healthy Playing Fields**

There is nowhere in the US where synthetic turf is recycled. The industry itself has admitted this in various public, recorded, meetings. I would ask that Mr. Bender provide proof of his ability to do this, clarify the number of turf fields he has recycled and the resulting products made from the recycled mixed plastic that contain such additives as flame retardants, PFAS and much more.

## **Doug Kobold, California Product Stewardship Council**

Thank you to Product Care for the informative presentation on EPR programs in Canada. After seeing some of the programs first-hand last month in both Vancouver and Toronto, I think it is important to note that the Canada programs are a mix of True EPR and Product Stewardship programs. This distinction is important, as True EPR programs are funded and run by the manufacturers/producers, while Product Stewardship programs are mostly funded by the consumers at point of sale, with little to no funding coming from the manufacturers. We, as an industry, need to be careful with this distinction, as the manufacturers should not be given credit under the guise of "Producer Responsibility" for programs they don't fund. When the producers are funding the end-of-life management costs, they may make different decisions while designing their products. The hope is that they will design them to be more environmentally friendly and that they will be more Durable, Reuseable, Repairable, & Recyclable.

## **Diana Conway, Safe Healthy Playing Fields Inc**

(Comment received at the end of the meeting and was published but not read. Will be read at upcoming November 3, 2021 meeting)

Synthetic turf fields are NOT recyclable anywhere in the US. Our 501-c-3 all-volunteer nonprofit has said this for over a decade. And industry has finally conceded we are right. In April 2021 when asked how many used synturfs were \*ever\* recycled in the US, the rep for TenCate (a global synturf manufacturer) stated during a public hearing "The answer is none." Since 1966. Ever. Today we know there are over 15,000 synturf fields in the ground right now and over 1,000 being installed annually (per the industry trade group STC). We believe those numbers are low. The scale of waste is staggering. At end-of-life, each one is 250+ tons of mixed toxic plastic waste with nowhere to go. To restate: Synturf can NOT be recycled anywhere in the US. It is being illegally dumped all over the US and Europe, as we helped document in stories picked up by Salon, The Atlantic, The Boston Globe, Fair Warning, The Intercept, and others. Remote areas are widely used to "store" what amount to hundreds of thousands of tons -- literally mountains of used synturf leaching its chemicals and plastics into our soil, air and water without regulation. Additionally, before its removal after 7-10 years, each field is estimated \*by industry\* to lose one to \*five tons\* of infill, per field, per year. Let that sink in-- it literally does. On top of the infill loss, the microplastic load is alarming: A typical synturf field is two acres of plastic surface, \*plus\* the surface area of some 800,000,000 (800M) plastic blades, all shedding microplastics from day 1. This load will dwarf the good work you are doing to educate the public and boost recycling participation. The European Chemicals Agency (ECHA) is preparing to ban synturf with tire infill as a \*leading\* contributor to microplastic pollution. Synturf is a toxic stew of heavy metals,

phthalates, carcinogens, endocrine disruptors, PFAS (yep), plasticizers and more. Grass is safer, softer, cooler, cheaper, and infinitely recyclable, compostable and renewable. Thank you for considering these comments, I would be happy to supply independent 3rd party verification of the disposal and toxicity issues. These points are beyond dispute. Diana Conway, President Safe Healthy Playing Fields Inc