



® April 19, 2018

1100 K Street
Suite 101
Sacramento
California
95814

Telephone
916.327.7500

Facsimile
916.441.5507

The Honorable Al Muratsuchi
Chair, Assembly Natural Resources Committee
California State Capitol, Room 2179
Sacramento, CA 95814

**Re: AB 2921 (Low) – Expanded Polystyrene Food Service Packaging Recovery and Recycling Act.
As Amended April 5th, 2018 – OPPOSE
To Be Heard in Assembly Natural Resources Committee – April 23, 2018**

Dear Assembly Member Muratsuchi,

The California State Association of Counties (CSAC) writes in opposition of AB 2921 which would allow for polystyrene food service packaging (PFP) manufacturers and polystyrene resin producers to voluntarily form or designate self-governing organization to deal with the collection and recycling of polystyrene food packaging. If manufacturers and resin producers choose to designate this organization at all, the bill would allow them to establish their own recycling goals and assessment fees. Enforcement has yet to be spelled out, and this bill doesn't specifically give CalRecycle much, if any, oversight.

This bill is essentially voluntary and does not hold manufacturers accountable for achieving recycling targets. As we have seen recently in the California carpet stewardship program, allowing an industry stewardship organization to set its own recycling goals and structure the program on their own has proven unsuccessful. Disposable food and beverage packaging is a serious problem as it is consistently one of the top most littered items in California. An NRDC study reported that local governments across California spend \$428 million each year to prevent and clean up litter. Even takeout food and beverage containers that already fit into current recycling infrastructure are commonly found in parks, waterways, streets and storm drains, oftentimes when disposed of properly as they are so lightweight. We must do more to address this issue. AB 2921 only addresses end-of-life management, recycling, rather than focusing on source reduction and innovation. While this bill would mandate manufacturers to pay a self-decided fee to fund recycling infrastructure and grants, it is not enough.

CSAC is supportive of the Extended Producer Responsibility Framework Approach. However, we do not see AB 2921 as the comprehensive solution to the growing problem of food service ware pollution. It is for these reasons that CSAC opposes AB 2921. If you have any questions about our position, please do not hesitate to contact me at cmartinson@counties.org or 916-327-7500, ext. 504.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Cara B. Martinson'.

Cara B. Martinson
Senior Legislative Representative

cc: Honorable Evan Low, California State Assembly
Members, Assembly Natural Resources Committee
Elizabeth MacMillan, Consultant, Assembly Natural Resources Committee
John Kennedy, Consultant, Assembly Republican Caucus