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# California Resource Recovery Association

October 6, 2008

Mr. Mike Chrisman, Chair  
Ocean Protection Council  
Coastal Conservancy  
1330 Broadway, Suite 1300  
Oakland, CA 94612

Submitted via e-mail to Rachel Couch at: [rcouch@scc.ca.gov](mailto:rcouch@scc.ca.gov)

## Re: Comments on Draft OPC Draft Implementation Strategy to Reduce and Prevent Ocean Litter

Dear Mr. Chrisman,

CRRA is the oldest and one of the largest non-profit recycling organizations in the United States dedicated to reducing waste, pollution, and green house gas production through reuse, recycling, composting and product stewardship.

CRRA is in agreement with the [California Product Stewardship Council's August 19, 2008 letter](#) re: *Comments on Draft Implementation Strategy to Reduce and Prevent Ocean Litter*. We strongly support CPSC's comments, and would amplify their point about aligning Implementation Task II with the CIWMB EPR Framework and with CSPC's Principles of Product Stewardship. Holding producers and brand owners, not retailers and the packaging industry, responsible for the disposition of their products and the packaging they choose for them, is critical to achieving the environmental impacts the Implementation Strategy is targeting.

Sincerely,

Julie Muir, President

Cc: Heidi Sanborn, California Product Stewardship Council  
Margo Reid-Brown, California Integrated Waste Management Board

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