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California Resource Recovery Association

June 12, 2009

Assemblymember Jared Huffman
California State Assembly
State Capitol, P.O. Box 942849
Sacramento, CA 94249-0006

Submitted via fax: (916) 319-2106

Re: AB 1343, Architectural Paint Recycling – Support if Amended

Dear Assemblymember Huffman,

The California Resource Recovery Association (CRRA) commends your effort to create an extended producer responsibility program for leftover and unwanted paint in California through Assembly Bill 1343. Paint is the single largest waste stream managed by local government household hazardous waste programs, representing 30-50% of our waste load, and costing millions of dollars annually in taxes and refuse rates.

The CRRA is a partner with the California Product Stewardship Council in the mission to shift California's product waste management system from one focused on government-funded and ratepayer-financed waste diversion to one that relies on producer responsibility, in order to reduce public costs and drive improvements in product design that promote environmental sustainability.

The CRRA supports the concepts of AB 1343, however we respectfully request an amendment to align the paint collection system with the State's EPR framework. To do this, several key issues need to be addressed in AB 1343. We request your consideration is supporting the addition of these measures to AB 1343 as a means of clarifying and improving the bill.

- Stewardship Plan - To ensure comprehensiveness and proper funding, the paint manufacturers must be required to submit a product stewardship plan that states the program's goals for source reduction, promoting the use of recycled-content paint, and establishing post-consumer paint collection opportunities.
- Collection and Management of Program Fees - For clarification of fee collection, AB 1343 should note the conditions of any consumer fee to recover the costs of the program.
- Mandatory Participation - To create a level playing field among manufacturers, participation in the program must be mandatory.
- State Oversight - To ensure participation, the sale of paint from non-participating manufacturers must be prohibited in the State of California.
- State Agency Procurement Requirements - To place additional transparency and enforcement provisions on the State to meet its paint procurement obligations.

We strongly urge you to amend the bill to address these changes before it is heard in the Senate Environmental Quality Committee. The CRRRA commends you for leading the State's effort to integrate the principles of extended producer responsibility into our outdated waste management structure, bringing California in line with the progressive waste management models and policies of Europe and Canada.

Respectfully,

Julie Muir

Julie Muir
President, CRRRA

Cc: Californians Against Waste (Fax: 916-443-3912)
California Product Stewardship Council (Fax: 916-485-2327)
Senate Environmental Quality Committee (Fax: 916-322-3519)
League of California Cities (Fax: 916-658-8240)
California State Association of Counties (Fax: 916-441-5507)
Regional Council of Rural Counties (Fax: 916-431-0101)

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