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California Resource Recovery Association

Mathy Stanislaus
Assistant Administrator
Office of Solid Waste and Emergency Response
United States Environmental Protection Agency
Washington, DC 20460

Sent to: aastanislaus@epa.gov

October 14, 2009

Dear Assistant Administrator Stanislaus,

Thank you for your September 4, 2009 letter. We welcome your invitation for input.

The California Resource Recovery Association (CRRA), California's statewide recycling association, 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. We enjoy a positive and productive relationship with USEPA Region 9 staff in San Francisco.

Traditionally, USEPA has not prioritized recycling and waste reduction efforts the way it has Superfund cleanup efforts or Brownfield Remediation, for example. But as the new OSWER report [*Opportunities to Reduce Greenhouse Gas Emissions through Materials and Land Management Practices*](#), and a growing body of literature now documents, recycling and waste reduction represent a far greater climate benefit opportunity than is commonly understood. The study is a great first step.

We promote the emerging view that recycling and waste reduction are not merely discards management practices, rather they constitute a critical part of the global *materials management* system upon which the provision of goods is based. Global resource depletion and the one-way use of resources, for both the provision of goods and for energy production, are at the heart of the global climate crisis. The opportunity to reduce GHG emissions quickly and cost-effectively through the replacement of virgin resources with recycled feed stocks, including the replacement of petrochemical fertilizers with soil amendment products produced from organic discards, is nothing less than profound.

We recognize that it will be very difficult to monetize these benefits, as carbon credits, across sectors and allocate them to appropriate parties. But the important thing now is to recognize the opportunity and elevate recycling and material management to the highest order of climate solutions. We would like to see the nation's top environmental office take the lead in elevating materials management practices including waste reduction, Extended Producer Responsibility (EPR), recycling, and composting, to a national environmental imperative.

Bob Gedert,
Executive Director
P.O. Box 607
Clovis, CA
93613-0607
916.441.CRRA [2772]
Fax 916.676-4882
E-mail: BobG@crra.com

To be consistent with the new view of discards management in the context of the global provision of goods, USEPA should redesign its solid waste and recycling efforts based on a materials management strategy, and go beyond the view of recycling as merely a discards management alternative to landfill burial:

1. Address not merely post consumer, end-of-the-pipe solid waste, but also the upstream waste created along the entire provision of goods supply chain. This means taking a leadership role in the promotion of national Extended Producer Responsibility (EPR) systems that would impact supply chains at the most efficient point of intervention – during product design. The California Integrated Waste Management Board has provided leadership in our state by adopting [CIWMB Strategic Directive #5](#) through which it seeks “statutory authority to implement the Extended Producer Responsibility Framework” in California. We would like to see USEPA assume similar leadership on EPR for the nation.
2. Promote a national initiative to examine existing price supports for the extraction and use of virgin materials vs. existing price signals for the use of more energy-efficient recycled feed stocks, and promote expanded investment in the nation's recycling infrastructure. Current literature shows that “significantly decreasing waste disposed in landfills and incinerators will reduce greenhouse gases the equivalent to closing one-fifth of U.S. coal-fired power plants. This is comparable to leading climate protection proposals such as improving vehicle fuel efficiency.”¹ This can be accomplished using existing, relatively low-capital technology through an expansion of the established recycling industries.
3. Adopt a goal of eliminating the disposal of organic materials in landfills and incinerators, and promoting the policies and infrastructure to return suitable organic discards to the soil and recover energy through mechanical or biological processes that preserve the ability of the material to be used as soil amendment. There is increasing literature that supports the fact that recovering organic discards for value-added processing to soil amendments does far more than merely reduce landfill gas generation. Just like recycling, the major benefit of compost use is the displacement of far more energy- and emissions-intensive products – petrochemical based fertilizers – as well as providing a host of emissions and environmental cobenefits including reduced demand for crop irrigation, increased carbon sequestration in crops and croplands, and reduced runoff of chemical fertilizers.

Together, these three policy areas constitute what many leaders in the materials management and recycling front lines refer to as the “Zero Waste” policy framework. Regardless of how it is labeled, these three areas of action represent a profound opportunity to increase the energy efficiency of our consumer-driven economy, repair the nation's croplands, and effect game-changing emissions reductions.

Finally, we would like to take this opportunity to invite you to speak at the 34th [CRRA Annual Conference](#) in Sacramento, August 8-11, 2010. Your attendance would give you direct access to 700-1000 of California's leading actors on recycling and material management policies and programs. We would be honored if you would be in attendance to address the CRRA community. Please contact Executive Director, Bob Gedert at BobG@crra.com.

Thank you again for your invitation to comment.

Respectfully,

J. Muir

Julie Muir, President

California
Resource
Recovery
Association

¹ *Stop Trashing the Climate* <http://www.stoptrashingtheclimate.org/>