



# California Product Stewardship Council

PO Box 216381, Sacramento CA 95821

September 7, 2007

Chair Margo Reid-Brown and Board Members  
California Integrated Waste Management Board  
1001 I Street  
P.O. Box 4025  
Sacramento, CA 95812

Sent via e-mail

**SUBJECT:** Letter of Support for Staff Recommendations in September Agenda Item #12

Dear Madam Chair and Board Members:

The California Product Stewardship Council (CPSC) is an organization that started in the Spring of 2006 as a result of regulations that make it illegal for residents to dispose of batteries, fluorescent lamps and other hazardous products in the trash. The organization is comprised of California local governments and local government associations aiming to transform the solid waste system in California from one focused on taxpayer and ratepayer funded waste diversion to one that relies on producer responsibility in order to reduce public costs and drive improvements in product design. We currently represent 25 cities and counties, plus other government groups such as stormwater management associations and a municipal utility district. The Regional Council of Rural Counties' Environmental Services Joint Powers Authority, representing 22 additional counties, joined CPSC in March 2007.

CPSC associates held a conference call Thursday September 6<sup>th</sup> to review the Agenda Item #12 and there was unanimous agreement that it is clearly thought through and well supported. CPSC strongly supports the staff recommendation that the Board adopt Option 1:

1. Adopt the EPR framework outlined in Attachment 1;
2. Develop a legislation proposal for an overall EPR framework;
3. Continue implementing voluntary product stewardship initiatives; and,
4. Convene an advisory committee to determine and prioritize products for new product stewardship initiatives.

Attached is a CPSC document outlining our recommended principles for framework legislation.

CPSC supports the definition of EPR in Attachment 1 as "the extension of the responsibility of producers, and all entities in the product chain, to reduce the cradle-to-cradle impacts of a

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[www.caproductstewardship.org](http://www.caproductstewardship.org)

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**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.

product and its packaging.” CPSC supports shared responsibility but we believe that responsibility lies mostly with the producers who design and market products and profit from the sale of those products.

CPSC also believes it is critically important as a process to first get agreement on the goals and guiding principles of product stewardship before selecting specific products. Getting agreement on the appropriate roles of government, industry and other stakeholders, and establishing a fair and transparent process that can be applied to a range of products, are the critical first steps. To begin product selection prior to the establishment of the “rules of the game” will likely continue the “piecemeal” approach that has already failed to work in California.

As is recommended in Option 1, CPSC prefers a performance-based, results-oriented approach, rather than prescriptive measures. Regulations and programs should be transparent and accountable while giving the private sector the freedom to apply its creativity and expertise to solve end-of-life management issues. The private sector has the knowledge of the products and the tools to ensure successful program design. We believe that engaging the private sector is the only way progress will be made in reducing waste and achieving sustainability goals. We look forward to working with the private sector to develop effective means of internalizing costs of private infrastructure to manage products at end of life, including helping educate consumers to use that infrastructure.

CPSC stands ready and willing to participate in the advisory committee to prioritize products for future new product stewardship initiatives.

We are grateful to the Board and the Board staff for taking such a leadership role on this important issue which is necessary to address the “other 50%”.

Sincerely,



Heidi Sanborn, Executive Director – Programs and Policy



Carol Misseldine, Executive Director – Operations and Education

cc: Mark Leary, Executive Director of CIWMB

Attachment: CPSC Framework Principles for Product Stewardship Policy