



August 5, 2014

Via Electronic Delivery Submission

Ms. Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814
Email: commentletters@waterboards.ca.gov.

Subject: Comment Letter – Trash Amendments

Dear Ms. Townsend:

SPI, The Plastics Industry Trade Association, appreciates the opportunity to provide comments concerning the Water Resources Control Board's (Board) proposed Trash Amendments. We believe that any efforts seeking real reduction in overall statewide trash/litter need to be balanced, environmentally sustainable and economically viable.

SPI's members represent the entire plastics industry supply chain, including processors, machinery and equipment manufacturers, raw materials supplier and brand owners. The industry employs nearly 900,000 workers and contributes \$373 billion in annual shipments to the national economy. Products of the plastics industry are utilized in most every sector of the economy. Examples include agriculture, construction, medical, automotive, aerospace, electronics, packaging, recreation and sports, plus more.

We thank the Board for its efforts to develop a statewide policy to reduce litter that flows into the state's waterways. After having reviewed the proposed amendments, we offer the following comments.

First, we oppose the suggestion of local ordinances banning products as an effective means to combat litter. We urge the Board to reject this punitive option. Combating litter in public spaces, including waterways, demands attention to the source or root cause of the problem, which is irresponsible behavior. Banning products will negatively impact consumers, manufacturers, their employees and local economies, with little certainty that this type of measure will change behavior and prevent littering. This sends a very chilling message to existing product manufacturers and those contemplating expanding or siting operations in the state.

Second, we support the use of best management practices (BMPs) described as litter education, expanded recycling and placing additional trash cans in public spaces. We do not support mandatory producer take-back programs which place the full burden on manufacturers with unknown costs and



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unfettered authority to regulators. We urge the Board to reject this option. This creates a state program financed by business, regardless of affordability and cost-benefit. Again, such a mandate does not address the root cause of the litter problem.

Though we oppose adoption of “regulatory source controls” such as product bans and “institutional controls” referencing mandatory and costly producer take-back programs, we recognize the need to reduce trash that is inappropriately discarded.

In reviewing the various compliance options, “full capture systems” as outlined, appear to offer an effective solution in preventing all forms of trash from entering the state’s waterways. These types of infrastructure controls are essentially working on a daily basis and their effectiveness in meeting the trash reduction objectives can be appropriately monitored and measured. Full capture systems, coupled with enforcement of litter laws, continued litter education, additional trash cans in public spaces and recycling will aid in addressing the litter problem in the state.

Thank you in advance for your consideration of our comments. If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jane Adams". The signature is written in black ink and is positioned above the typed name and title.

Jane Adams

Senior Director, State Government Affairs