

September 8, 2011

Department of Resources Recycling and Recovery
1001 I Street
PO Box 4025
Sacramento, CA
carpet@calrecycle.ca.gov

Subject: CPSC Comments on Proposed Product Stewardship for Carpet Regulations

To Whom It May Concern:

The California Product Stewardship Council (CPSC) appreciates the opportunity to comment on the proposed regulations for carpet stewardship which are intended to implement AB 2398, now in statute.

We previously provided a comment letter dated February 25, 2011 on the draft regulations. We are very pleased that the current version of the regulations addressed all of our comments to our satisfaction. Therefore, we wish to simply thank the CalRecycle staff for accepting those recommendations and for starting with an informal comment period before the formal comment period to allow more time for all the stakeholders to provide input.

After reviewing other comment letters submitted by other stakeholders, we wish to simply make one important point related to Section 18943 (a)5(E): CPSC supports the Regional Council of Rural Counties (RCRC) in ensuring that all consumers that pay a fee have access to recycle their carpet. The current language does meet that test and we will defer to RCRC if there are any proposed changes to the existing language as to what meets their needs.

Lastly, it is important to recognize that this is the first time CalRecycle staff and the California stakeholders have developed a regulations package to implement producer responsibility legislation. AB 2398 is the first carpet stewardship legislation in the world and we look forward to working with all the stakeholders to ensure it works. California needs solutions to its waste and economic problems, and we are trying something new with this legislation. We are leading the nation and maybe the world. We know it is not a perfect Extended Producer Responsibility model, but it is a first and a result of compromise. We hope everyone works together to ensure the program starts on time July 1, 2012.

Thank you again for the opportunity to comment.

Sincerely,



Heidi Sanborn, Executive Director