



California Product Stewardship Council

PO Box 216381, Sacramento CA 95821

September 14, 2007

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

Dear Madam Chair,

The California Product Stewardship Council (CPSC) applauds the Board's leadership in developing a framework approach for Extended Producer Responsibility in California. At its September 19th meeting, we urge the Board to adopt Option 1 from the recommendations for Agenda Item 12 which directs staff to proceed with drafting framework legislation.

We heard the concerns that certain manufacturers were not adequately consulted about the proposal. Because local governments represent the public interest and are legally and financially burdened under current policy with managing products at end of life, it is essential for the State to establish the principle of producer responsibility as a ground-rule.

Pamela Williams, representing the California Retailers Association, noted in her supporting testimony that Strategic Directive 5 on Producer Responsibility is part of a "trend that is sweeping the globe." The framework prepared by your staff reflects and builds on current state-of-the art thinking about producer responsibility derived from experience in other areas.

Once framework Producer Responsibility legislation is introduced and adopted in California, the affected industries will have ample opportunity to provide detailed industry input in the development of specific programs that affect them. In fact, the proposed framework encourages them to design the programs.

California has the opportunity to be the leader in bringing producer responsibility to the United States by establishing a clear policy direction through the adoption of framework legislation, and then implementing it through a phased-in product-by-product approach with full stakeholder consultation. CPSC urges the Board to provide this needed leadership by adopting Option 1 on September 19th.

Sincerely,

Carol Misseldine
Executive Director – Operations

www.caproductstewardship.org

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.