



January 9, 2019

Attention: Carpet Team  
Department of Resources Recycling and Recovery  
1001 I Street Sacramento, CA 95812

Submitted via email: [carpet@calrecycle.ca.gov](mailto:carpet@calrecycle.ca.gov)

**SUBJECT: RECOMMENDATION OF DISAPPROVAL OF CHAPTER 0**

Dear Carpet Team at CalRecycle:

The National Stewardship Action Council (NSAC) and the California Product Stewardship Council (CPSC) recommend disapproval of Chapter 0 of the Revised California Carpet Stewardship Plan 2018-2022 (Chapter 0) submitted by CARE on December 14<sup>th</sup>, 2018 as it still does not meet the legislative requirements of AB 1158, specifically §42973.5 – All data necessary for the Department to evaluate the effectiveness of the program as it is described in the carpet stewardship plan and in annual reports.

Even after three rounds of submissions in 2018 and a specific request from CalRecycle to provide the economic model in the request for approval (RFA) from October 2018, CARE did not provide a detailed economic analysis to validate the Subsidy Justification and Conversion Cost Models, including transparency for how fee payer money will be used to achieve 24% recycling goal by 2020. We understand CalRecycle's conditional approval of the Revised Plan was necessary to protect California carpet recycling infrastructure, but were surprised to read in the same RFA that CARE had not explained the \$5 million error in the Conversion Cost Model and rationale for revising the assessment from \$.40 to \$.35 per square yard.

Again, we raise our concerns that CARE has demonstrated fee payer money has been used on research studies, economic models, and grants without providing the data to the public, metrics of success for studies and pilots, and clearly sharing the results of all expenditures to the public.

We agree with CalRecycle on the need for statutory changes to establish a “bridge plan”, require differential assessments or rebates for more recyclable carpet, establish convenient collection metrics and goals, and setting recycled content requirements for new carpet.

**In conclusion, NSAC and CPSC recommend CalRecycle disapprove the Carpet Stewardship Plan.**

Sincerely, 

Heidi Sanborn, Executive Director, National Stewardship Action Council



Doug Kobold, Executive Director, California Product Stewardship Council