

March 27, 2025

The Honorable Senator Catherine Blakespear, Chair
1021 O Street, Suite 7720
Sacramento, CA 95814

Submitted Via LegInfo

Subject: SUPPORT SB 501 (Allen): Household Hazardous Waste Producer Responsibility Act

Dear Senator Blakespear,

On behalf of the Board of the California Product Stewardship Council (CPSC), I write to express our **SUPPORT**, for **SB 501 (Allen)**, which would establish an Extended Producer Responsibility (EPR) program for Household Hazardous Waste (HHW).

The California Product Stewardship Council (CPSC) was founded in 2007 with the mission to shift California's material and energy policies toward a circular economy through product stewardship and extended producer responsibility. CPSC has played an instrumental role in passing many of California's major EPR programs, including SB 212 (Jackson, 2018) for medicine and sharps (an HHW material stream), and most recently, SB 707 (Newman, 2024) for textiles with hazardous chemical management provisions. CPSC wants to ensure Product Stewardship and Extended Producer Responsibility (EPR) programs run well in California, to serve as a model for other states.

EPR is a frequently used policy solution for products that have a uniquely problematic end-of-life consequence, whether it be environmental, occupational, or financial. HHW materials are one of the highest cost wastes per pound for local governments to manage on behalf of their ratepayers. These costs can easily exceed \$1,000.00/ton, on average, as compared to municipal solid waste at an average of \$100.00/ton, commingled recyclables at around \$150.00/ton, and organics averaging \$125.00/ton.

Costs to public entities can be reduced if the producers absorb the costs through an EPR program. That shift in financial exposure makes producers more likely to design their products to be less toxic and less costly to manage responsibly. As we've seen in practice, HHW reuse, chemical disclosures and management, and a widespread education campaign are key source reduction measures in an EPR program. Based on CPSC's experience working on EPR for HHW and other products, we support SB 501, want to ensure that the program does not overlap or conflict with other established and proposed programs.

SB 501 is a critical piece of legislation for creating an end-of-life solution for various problematic products. CPSC supports SB 501, and respectfully urge you and the Committee to vote "aye".

Respectfully,



Doug Kobold, Executive Director