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LOS ANGELES COUNTY  
SOLID WASTE MANAGEMENT COMMITTEE/  
INTEGRATED WASTE MANAGEMENT TASK FORCE  
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December 6, 2018

Mr. Scott Smithline, Director  
California Department of Resources  
Recycling and Recovery (CalRecycle)  
P.O. Box 4025  
Sacramento, CA 95812-4025

Dear Mr. Smithline:

**COMMENTS ON SHIFTING RECYCLING MARKETS: IMPACTS ON AB 939 COMPLIANCE FOR JURISDICTIONS - NOVEMBER 7, 2018 CALRECYCLE WORKSHOP**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) would like to express its appreciation to the California Department of Resources Recycling and Recovery (CalRecycle) for conducting this workshop to discuss China's National Sword import policy on recycling efforts by jurisdictions in California. Also discussed were potential changes to CalRecycle's Countywide Integrated Waste Management Plan Enforcement Policy Part II (Enforcement Policy) to evaluate a jurisdiction's compliance with Assembly Bill 939 (1989), Assembly Bill 341 (2011), and Assembly Bill 1826 (2014). CalRecycle staff proposed the following additions to the Enforcement Policy for consideration and sought input from stakeholders:

1. The extent to which China's or other countries' import policies caused the absence or loss of a market for recyclable materials diverted from solid waste facilities that necessitated the disposal of those materials as a temporary measure to avoid a public health threat associated with storing recyclable materials in amounts that exceed permitted or design capacity of a solid waste facility.
2. The extent to which the jurisdiction has made efforts to reduce contamination and improve the quality of recycled materials so that they can be used as feedstocks in manufacturing of new recycled-content products.
3. The extent to which the lack of an available market for one or more types of recyclable materials, which prevented the jurisdiction from fully implementing its diversion

programs, was the result of circumstances beyond the reasonable control of the jurisdiction.

The Task Force has reviewed the proposed additions to the Enforcement Policy in concert with foreign countries' new import policies and the resulting impacts on recycling efforts by jurisdictions in California. The Task Force respectfully offers the following comments:

- The Task Force supports recommendations 1 and 3 as proposed.
- Recommendation 2, as proposed, would force local jurisdictions to reduce contamination without having the manpower, funding, or infrastructure needed to handle and process recyclable materials. We recommend rewording as follows: *"The extent to which the jurisdiction has made efforts to reduce contamination and improve the quality of recycled materials."*
- The Task Force recommends CalRecycle working collectively and in partnership with local jurisdictions, manufacturers, haulers, and other stakeholders to achieve the State's recycling goals. The Task Force strongly believes that the development of much needed in-state infrastructure using various types of recycling technologies is essential to meet the State's 75 percent recycling goal.
- The Task Force further recommends that the State provide strong incentives to manufacturers, beyond the RMDZ Loan Program, to finance facilities that process and manufacture with recyclable materials.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939, as amended), the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and the 88 cities in Los Angeles County with a combined population of more than ten million. The Task Force also addresses issues impacting the system on a Countywide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, Los Angeles County Board of Supervisors, City of Los Angeles, waste management industry, environmental groups, the public, and a number of other governmental agencies.

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As a collective group responsible for ensuring a coordinated, cost-effective, and environmentally sound solid waste management system in Los Angeles County, the Task Force respectfully requests that the above suggestions be considered and incorporated. Should you have any questions regarding these comments, please contact Mr. Mike Mohajer, Task Force member, at [MikeMohajer@yahoo.com](mailto:MikeMohajer@yahoo.com) or at (909) 592-1147.

Very truly yours,



Margaret Clark, Vice-Chair  
Los Angeles County Solid Waste Management Committee/  
Integrated Waste Management Task Force and  
Mayor Pro Tem, City of Rosemead

BH:fm:cso

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cc: CalRecycle (Cara Morgan, Howard Levenson)  
League of California Cities  
League of California Cities, Los Angeles Division  
California State Association of Counties  
Each Member of the Los Angeles County Board of Supervisors  
Sachi A. Hamai, Los Angeles County Chief Executive Officer  
Each City Mayor/Manager in the County of Los Angeles  
South Bay Cities Council of Governments  
San Gabriel Valley Council of Governments  
Gateway Cities Counsel of Governments  
Southern California Association of Governments  
Each City Recycling Coordinator in Los Angeles County  
Each Member of the Los Angeles County Solid Waste Management  
Committee/Integrated Waste Management Task Force