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LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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June 27, 2012

The Honorable Christine Kehoe, Chair
Senate Appropriations Committee
State Capitol, Room 2206
Sacramento, CA 94248-0001

Dear Senator Kehoe:

**OPPOSE UNLESS AMENDED ASSEMBLY BILL 549 (AMENDED MAY 31, 2012)
RECYCLING: ELECTRONIC WASTE**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) **opposes unless amended** Assembly Bill 549 (AB 549) which, if enacted would among other things, require CalRecycle to establish documentation requirements to prove that electronic waste covered under the Hazardous Electronic Waste Recycling Act of 2003 (Act) was generated in California and eligible for recycling/recovery payment pursuant to the Act.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939 [AB 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 in excess of ten million. Consistent with these responsibilities and to ensure a coordinated, cost-effective, and environmentally sound solid waste management system in Los Angeles County, 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, County of Los Angeles Board of Supervisors, City of Los Angeles, waste management industry, environmental groups, the public, and a number of other governmental agencies.

The Task Force is supportive of the author's effort to address the problem of fraudulent claims for recycling or recovery payments within the electronic waste recycling program operated by CalRecycle. However, tasking CalRecycle to develop documentation requirements that prove covered electronic waste (CEW) was generated within the State beyond simple proof of in-State residency seems impractical for the several reasons listed below:

- Consumers of CEW generally use these products for a number of years. It should be assumed that most do not maintain documentation that can prove the products were purchased and used in-State. Moreover, consumers who purchased products in California but use the products out of the State have paid the recycling/recovery fee and should be able to recycle the products within California.
- The requirement would put a strain on Household Hazardous Waste/E-Waste programs administered by local governments in a time when funding is scarce. Additional staff would be required in order to verify the CEW was generated in-State. Moreover, attendance at these events largely depends on the convenience of a quick drop-off of items by consumers. In the event residents were required to show proof of in-State generation of their CEW, it would potentially slow the process down considerably.
- It is our understanding that this bill stems from unscrupulous electronic waste collectors importing loads of electronic waste from out of the State in order to receive payment from CalRecycle for the waste. We are not aware of government administered collection events where this dishonest and costly practice is taking place. For these reasons, we respectfully request that collection events administered by local government agencies be exempted from this requirement.
- If consumers of CEW are turned away at E-Waste recycling events and centers, it would likely lead to illegal disposal of these products with potentially detrimental damage to the environment.

A preferable approach to the management of potentially hazardous materials, such as electronic waste, is to have the manufacturers of those products take responsibility for collecting and properly managing the products they manufacture at the end of their useful lives. Such Extended Producer Responsibility (EPR) policies have proven highly effective in other countries and are being implemented in California for the management of waste carpets and paint. EPR would alleviate the issues identified above since manufacturers could more easily and cost effectively track the location where their products are sold through manufacturer-specific model numbers and other mechanisms.

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For these reasons, the Task Force **opposes** AB 549 **unless it is amended** as discussed above. If you have any questions, please contact Mr. Mike Mohajer of the Task Force at MikeMohajer@yahoo.com or (909) 592-1147.

Sincerely,



Margaret Clark, Vice-Chair
Los Angeles County Solid Waste Management Committee/
Integrated Waste management Task Force and
Council Member, City of Rosemead

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cc: Assembly Member Wilmer Carter
Assembly Member Bob Wieckowski
Each member of the Senate Appropriations Committee
Each Member of the Los Angeles County Legislative Delegation
California State Association of Counties
League of California Cities
League of California Cities Los Angeles County Division
Each Member of the Los Angeles County Board of Supervisors
San Gabriel Valley Council of Governments
South Bay Cities Council of Governments
San Fernando Valley Council of Governments
Gateway Cities Council of Governments
Westside Cities Council of Governments
Each City Mayor and City Manager in the County of Los Angeles
Each Member of the Los Angeles County Integrated Waste Management Task Force