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LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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June 15, 2023

The Honorable Luz M. Rivas, Chair
Assembly Committee on Natural Resources
1020 N Street, Room 164
Sacramento, CA 95814

Dear Assembly Member Rivas:

**OPPOSE UNLESS AMENDED - SENATE BILL 665 (ALLEN) AS AMENDED ON
MAY 18, 2023 – PLASTIC WASTE: SINGLE-USE PLASTICS ALTERNATIVES:
WORKING GROUP**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) respectfully **opposes** Senate Bill 665 (SB 665), as amended on May 18, 2023, **unless amended** to address the recommendations enlisted below:

If enacted, the proposed legislation would require the California Environmental Protection Agency, by January 1, 2025, to establish a working group consisting of the Department of Resources Recycling and Recovery, the State Water Resources Control Board, the Department of Toxic Substances Control, the Office of Environmental Health Hazard Assessment, and the Ocean Protection Council to establish a framework for evaluating novel material types as they are developed, in order to inform state policy decisions designed to create a more sustainable and circular economy. The bill would further require the working group to, among other things, develop recommendations related to novel material types, including the appropriate marketing of the material, the handling of the material at the end of its useful life, and how the material needs to be treated in relation to existing state policies, rules, and regulations.

The Task Force agrees and supports establishment of a working group to identify and reduce the environmental impacts of plastic packaging and food service ware and ensuring that new materials are not harmful to the human health, the environment, and can be recycled or safely reused.

However, the State must be in a position to not only appropriately manage harmful materials as they are introduced in the market, but to achieve the zero waste targets and accelerate a circular economy. The working group should include stakeholders that

have the expertise to identify environmentally friendly solutions that include flexibility in processing various waste streams, reducing dependency on landfills and incineration, while creating renewable energy/fuels, cleaning the air of pollutants and greenhouse gases, and reducing dependency on fossil fuels. As such, the Task Force respectfully **opposes** the bill unless it is **amended to address the following** concerns and recommendations:

- Section 40201 of the Public Resources Code (PRC) – Revise the definition of "*Transformation*" to **exclude** "*Incineration*."
- Section 42041(aa) (2) of the PRC – Revise the definition to indicate that "*recycle*' or '*recycling*' does not include '*incineration*'."
- Section 42375(a) of the PRC – Amend to expand the inclusion of the California Air Resources Board (CARB), the Department of Public Health.
- Section 42375(c) of the PRC – Amend to have the working group include Conversion Technologies (CTs) and Advanced Recycling Technologies in recommendations, specifically how conversion technologies can be used to manage materials at the end of its useful life.
 - The working group shall also develop a set of recommendations to inform state policy related to novel material types, including, but not limited to, appropriate marketing of the material, how the material is handled at the end of its useful life, *how conversion technologies can be used to manage materials at the end of its useful life*, and how the material needs to be treated in relation to existing state policies, rules, and regulations.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (AB 939), 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 and 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.

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Based on the foregoing, the Task Force respectfully **opposes** SB 665 **unless amended** to address the recommendations in this letter. If you have any questions, please contact Mr. Mike Mohajer, a member of the Task Force, at MikeMohajer@gmail.com or at (909) 592-1147.

Sincerely,



Sam Shammass, Vice-Chair
Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force

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cc: Senator Allen
Each Member and staff of the Assembly Committee on Natural Resources
California State Association of Counties
League of California Cities – Los Angeles County Division
Each Member of the Los Angeles County Board of Supervisors
Fesia A. Davenport, Los Angeles County Chief Executive Officer
Gateway Cities Council of Governments
San Gabriel Valley Council of Governments
South Bay Cities Council of Governments
Westside Cities Council of Governments
Each City Mayor and Manager in the County of Los Angeles
Each City Recycling Coordinator in the County of Los Angeles
Each Member of the Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force