



March 21, 2023

The Honorable Ben Allen
Chair, California State Senate Environmental Quality Committee
1021 O Street, Room 6610
Sacramento, CA 95814

**RE: Senate Bill 665 – SUPPORT
As Introduced February 16, 2023**

Dear Senator Allen:

On behalf of the Rural County Representatives of California (RCRC), California State Association of Counties (CSAC) League of California Cities (Cal Cities), and South Bayside Waste Management Authority (ReThink Waste), we support Senate Bill 665, regarding single-use plastic alternatives.

Senate Bill 665 requires CalEPA to establish a working group to develop a framework for evaluating novel material types used as single-use plastic alternatives. The working group framework is intended to inform policy decisions regarding marketing, handling, and treatment under the state's existing laws.

Local governments supported last year's Senate Bill 54, which requires producers of single-use packaging and plastic single-use food service ware to take responsibility for the end-of-life management of those materials. As the entities generally responsible for management and disposal of the state's solid waste stream, local governments support thinking ahead to avoid regrettable product substitutions, as SB 665 seeks to accomplish. There have been too many circumstances where the replacement for a given product turns out to be more difficult or costly to manage and recycle at the end of its useful life. We believe the working group's framework will be helpful to proactively consider and determine how to respond to quickly evolving packaging types and forms.

While supportive of SB 665, we suggest refining the scope of the framework's assessment and the individuals with whom the working group must consult. SB 665 appropriately requires the framework to determine potential impacts to human health and the environment; however, we believe it would be additive for the framework to also consider the ease with which those material types can be readily recycled or reused. Additionally, local agencies have the most practical experience with managing and recycling end-of-life products. As such, their perspective would add tremendous experience and knowledge to this discussion and help to navigate distinctions between

The Honorable Ben Allen
Senate Bill 665
March 21, 2023
Page 2

what is practically recyclable from what is merely theoretically recyclable. To address these concerns, we respectfully suggest the following minor amendments to clarify the scope of the review and persons with whom the working group must consult:

42375 (b)(1) Ensure the framework can be used as a comparative tool to assess novel material types to determine potential impacts to human health and the environment **and the ease with which those material types can be readily recycled or reused**. The framework shall enable an assessment and categorization based on the full life cycle of novel material types, including, but not limited to, the material's source and its end-of-life properties...

(3) Consult with academic experts in this sector, **local agencies responsible for solid waste management and recycling**, industry innovators, environmental advocacy organizations, and environmental justice advocates.

For the above reasons, we are pleased to support SB 665 and urge your "Aye" vote in committee. If you should have any questions, please do not hesitate to contact us at jkennedy@rcrcnet.org, awaelder@counties.org, nromo@calcities.org, or jlamariana@rethinkwaste.org.

Sincerely,



JOHN KENNEDY
Policy Advocate
RCRC



ADA WAELDER
Legislative Advocate
CSAC



NICK ROMO
Legislative Representative
CalCities



JOE LA MARIANA
Executive Director
Rethink Waste

cc: Members of the Senate Environmental Quality Committee
Brynn Cook, Consultant, Senate Environmental Quality Committee
Scott Seekatz, Consultant, Senate Republican Caucus