



January 21, 2007

Dr. Robert F. Sawyer, Chair  
California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95812

**RE: IMPLEMENTING AB32**

Dear Dr. Sawyer:

We at the Northern California Recycling Association – a trade association formed in 1977 that has about 190 members – ask that your agency's AB32 rulemaking analysis aimed at decreasing greenhouse gases (GHGs) examine the effects of expanding recycling and preventing landfilling. We believe the impact could be so large that recycling's expansion alone might accomplish nearly all your targeted GHG reductions. We hope this potential will be first among the technological developments your new Economic and Technology Advancement Advisory Committee will analyze.

The astonishing scope of recycling's potential to reduce GHGs can be appreciated more fully in light of these points:

- Recycling is already large. Since the passage of Byron Sher's AB939, the California Integrated Waste Management Act in 1989, recycling has grown from processing 5 million tons of resources per year in 1990 to the 35 million tons counted today. Both of these numbers may be underestimates.
- The USEPA reports that nationally the recycling industry is as large financially as the auto industry.
- Recycling and recycling-based businesses, now a diverse collection of industries, are poised at the brink of significant expansion because cities and counties, faced with increasingly troublesome problems from solid-waste systems including landfills, are adopting goals of achieving Zero Waste. Oakland, Berkeley, Palo Alto, and San Francisco have all adopted Zero Waste goals and are planning and implementing innovative resource-handling systems.
- Recycling significantly reduces the need for energy generation. In the autumn of 2005 our association brought a climate-change expert from the USEPA, Henry Ferland, to California. We asked him to calculate how much new energy the country would need if all

current recycling were to stop overnight, and if we had to make all the same finished goods from virgin resources. His back-of-the envelope calculation was that the nation would need 80 to 100 new full-size power plants. So our impact is already large, and further expansion of recycling will further reduce the need for energy generation.

- Recycling technologies also directly reduce GHGs. Composting, for example, generates some carbon dioxide but also sequesters carbon in the compost product, and it prevents landfilling that generates more problematical methane. There are many proven technologies for composting. Some use in-vessel composting to generate methane, which can be controlled, captured, and used as a replacement energy source instead of being uselessly flared off as most landfills must do. In the late 1970s one proposal even suggested that, since composting releases CO<sub>2</sub>, and since commercial growers burn fossil fuels in greenhouses to provide CO<sub>2</sub> for their crops, the CO<sub>2</sub> released by controlled composting could be captured for use in commercial greenhouses. Today this is being done in the Netherlands. The development opportunities are large.

Recyclers expect that the garbage industry will present you with arguments portraying our industry as small and at capacity. Our diverse industries compete with theirs for resources and growth opportunities. The garbage industry has enjoyed a century of monopoly control over discarded resources in our cities, supported by local governments concerned primarily to keep the streets safe from disease vectors. But recycling achieves that same goal while taking the planet into a sustainable future of plentiful resources and clean air.

Since California had 44 million tons of garbage last year, and since more than 80% of the garbage is composed of commonly-recycled materials that could be processed using today's technologies, and since recycling reduces the need for energy generation and also directly reduces GHGs, we believe that recycling could reduce GHGs by nearly the amount the state needs to achieve its goals.

NCRA looks forward to working with you and your staff to explore the rich opportunities before you in implementing AB 32.

Sincerely yours,

Mary Lou Van Deventer  
President

cc: Governor Schwarzenegger Senate President Pro Tem Perata; Speaker of the Assembly Nunez; Attorney General Brown; Assembly Member Fran Pavley; Assembly Member Loni Hancock