



**NATIONAL
STEWARDSHIP
ACTION COUNCIL**

ADVOCATING FOR A CIRCULAR ECONOMY

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September 6, 2018

Attention: Carpet Team
Department of Resources Recycling and Recovery
1001 I Street Sacramento, CA 95812

Submitted via email: carpet@calrecycle.ca.gov

SUBJECT: RECOMMENDATION OF DISAPPROVAL OF CARPET PLAN 2018-22

Dear Carpet Team at CalRecycle:

The National Stewardship Action Council (NSAC) has not changed our position on the recommendation for disapproval of the CARE carpet stewardship plan 2018-22 (Plan) submitted August 17th, 2018 because our previously stated concerns have not been adequately addressed in this Plan. We agree with CalRecycle's reasons for disapproving the Plan in May and do not think CARE has remedied the fatal flaws in this version of the Plan.

After two prior Plan disapprovals and running a program that is out of compliance for three years, CARE has demonstrated it is not a good steward of public fee money:

- The latest Plan still does not provide convenient access for all California residents to have carpet recycling eight years after passing the authorizing legislation.
- Fee payer money has been used on research studies, economic models, and grants without methodological transparency, metrics of success, and clearly relaying results of such expenditures to the public.
- CARE as a 501(c)3 public benefit non-profit organization has still not provided adequate transparency regarding budget line item and recyclability measurements. as recommended by the Advisory Committee and requested by CalRecycle.

For these reasons, NSAC recommends CalRecycle disapprove the Carpet Stewardship Plan and take action to have CARE return California fee with a transition plan to ensure payments to those in our recycling infrastructure continue until an alternate stewardship organization has an approved Plan.

Sincerely,

Heidi Sanborn, Executive Director