



June 8, 2023

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We, the undersigned consumer and environmental advocacy groups, extend to you our full support in reforming the broken bottle deposit return system under SB 1013. SB 1013 is a historic reform that, for the first time in California, puts the responsibility for recycling empty containers onto supermarkets, big box stores and other major retailers of California Redemption Value (CRV) beverages.

Your writing of the regulations to underpin this critical reform is central to its success in extending consumers easy and convenient bottle deposit returns. We offer these recommendations for the regulatory process:

- Special interest groups would want delay on implementation of SB 1013. CalRecycle and the Legislature should reject any delays sought. CalRecycle should meet its statutory deadlines of unveiling emergency regulations by January 1, 2024, with implementation of the law beginning on January 1, 2025. Consumers have waited too long for reform.
- Universal deployment of automated collection systems is the key to all successful bottle deposit return systems, including reverse vending

machines and bag drop sorting systems. CalRecycle should allocate \$73.3 million it already has in grants as quickly as possible to retailers and redemption centers to automate empty container returns and the payment of CRV refunds and to open new redemption centers. By the end of June, CalRecycle should announce the application process. By July 31, 2023, CalRecycle should award the money.

- CalRecycle has the legal authority to set out how many new points of return in unserved convenience zones retailers must provide to guarantee widespread consumer convenience. Today, only one recycling center exists for every 31,600 consumers in California compared to return locations each serving several hundred consumers in states and countries with far more successful programs. We urge CalRecycle to use the authority bestowed by SB 1013 to increase the number of redemption points so that one redemption point will serve no more than 10,000 consumers.

- CalRecycle should create a numerical standard for the physical capacity of redemption points and ensure that grocery stores conveniently locate enough of them to ensure that the state meets its statutory goal of 80% recycling of deposit beverage containers sold in the state each year. Applications made by supermarket cooperatives to provide redemption should include physical capacity of redemption points, amount of container storage space, number of trucks and frequency of pickups to prove supermarkets can handle the containers.

- Based on requirements in other deposit-return states and countries, CalRecycle should ensure that machines and receptacles for bag drop offs installed at supermarkets offer maximum convenience. We recommend at least 70 hours a week of redemption service to be deemed “open for business.” Redemption depots should be open for at least the same number of hours.

- CalRecycle should ensure that dealer cooperative redemption plan proposals are subject to written public review and also hold public hearings with right of verbal comment prior to approving any proposals.

Sincerely,

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Consumer Watchdog

Jenn Engstrom
State Director
CalPIRG

Laura Deehan
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