

Date of Hearing: July 1, 2024

ASSEMBLY COMMITTEE ON NATURAL RESOURCES

Luz Rivas, Chair

SB 707 (Newman) – As Amended June 10, 2024

SENATE VOTE: 32-8

SUBJECT: Responsible Textile Recovery Act of 2024

SUMMARY: Establishes an extended producer responsibility (EPR) program (i.e., stewardship program) for waste textiles.

EXISTING LAW:

- 1) The California Integrated Waste Management Act of 1989, administered by the Department of Resources Recycling and Recovery (CalRecycle), generally regulates the disposal, management, and recycling of solid waste. Establishes a state recycling goal that 75% of solid waste generated is to be diverted from landfill disposal through source reduction, recycling, and composting by 2020. (Public Resources Code (PRC) 40000 *et seq.*)
- 2) Establishes the Plastic Pollution Prevention and Packaging Producer Responsibility Act, which imposes minimum content requirements for single-use packaging and food ware and source reduction requirements for plastic single-use packaging and food ware, to be achieved through an EPR program. (PRC 42040 *et seq.*)
- 3) Establishes the Used Mattress Recovery and Recycling Act, which creates an EPR program for the collection and recycling of used mattresses. (PRC 42985 *et seq.*)
- 4) Establishes the Electronic Waste Recycling Act of 2003, which requires consumers to pay a fee for specified electronic devices, defined to include video screens larger than four inches and battery-embedded products and establishes processes for consumers to return, recycle, and ensure the safe disposal of covered electronic devices. (PRC 42460 *et seq.*)
- 5) Requires CalRecycle to establish a three-year pilot project located in the Los Angeles and Ventura Counties partnering with garment manufacturers to study and report on the feasibility of recycling fabric. (PRC 40512)
- 6) Establishes, upon appropriation from the Legislature, a Zero-Waste equity grant program that can be used for repair and extending the life of products including textiles. (PRC 42999.5)
- 7) Defines “recycle” or “recycling” as the process of collecting, sorting, cleansing, treating, and reconstituting materials that would otherwise ultimately be disposed of onto land or into water or the atmosphere, and returning them to, or maintaining them within, the economic mainstream in the form of recovered material for new, reused, or reconstituted products, including compost, that meet the quality standards necessary to be used in the marketplace. Specifies that “recycling” does not include combustion, incineration, energy generation, fuel production (except anaerobic digestion), and other forms of disposal. (PRC 42041 (aa))

THIS BILL establishes the Responsible Textile Recovery Act of 2024 (Act), which:

- 1) States that the purpose of the Act is to increase the amount of postconsumer apparel and textile articles that are diverted from landfills and reused, repaired, and recycled into secondary products or otherwise managed in a manner that is consistent with the state's waste management hierarchy. States that the purpose of the Act is that any producer, regardless of whether the producer is domiciled in California, who sells, offers for sale, or distributes a covered product into the state to be responsible for complying with the Act.
- 2) Requires CalRecycle to adopt regulations to implement the bill's requirements with an effective date no earlier than January 1, 2028.
- 3) Requires producers of covered products to form and join a producer responsibility organization (PRO) for the purposes of complying with the Act. Requires the governing body of the PRO to submit an application to CalRecycle by January 1, 2026, describing how the PRO meets the requirements to be an approved PRO. If approved, requires the PRO to proceed to carry out the requirements of the bill.
- 4) Requires CalRecycle to approve a PRO that meets the requirements of the Act by March 1, 2024. Requires that the PRO have a governing board, as specified, and demonstrate that it has adequate financial responsibility and financial controls in place. Authorizes CalRecycle to approve additional PROs after January 1, 2035, as specified.
- 5) Requires producers of covered products to join the approved PRO by July 1, 2026.
- 6) Specifies that upon approval of a PRO plan (plan), or January 1, 2030, whichever is sooner, a producer is subject to penalties under the Act unless the producer is a member of a PRO and all covered products are accounted for in the plan. If an entity becomes a producer, requires the producer to join the PRO and comply with the Act within 90 days.
- 7) Specifies that a producer is not in compliance with the Act and is subject to penalties if a covered product sold or offered for sale by the producer is not subject to an approved plan.
- 8) Requires the PRO to prepare an initial statewide needs assessment to determine the necessary steps and investment needed for covered products to achieve the requirements of the Act by March 1, 2027. Requires that the needs assessments be updated every five years. Authorizes the PRO to prepare different needs assessments covering different covered products. Requires the PRO to develop the needs assessment in consultation with CalRecycle and local jurisdictions. Requires CalRecycle to approve, conditionally approve, or disapprove the needs assessment within 90 days of submission.
- 9) Requires the needs assessment to:
 - a) Be designed to inform the program budget and plan; and,
 - b) Include an evaluation of specified factors relating to covered products and covered product categories, including the existing scope of disposal and collection and recycling needs to comply with the Act.
- 10) Requires the PRO to include any local jurisdiction that offers to participate in the stewardship program and to comply with the PRO requirements as a collection site within 90 days. Authorizes the PRO to suspend or terminate a collection site that does not comply with all

applicable federal, state, or municipal laws or adhere to the rules established by the PRO and requires the PRO to notify CalRecycle if a collection site fails to comply with specified requirements.

- 11) Requires that collection sites be operated and managed to ensure that covered products are collected safely and handled properly. Allows collectors and authorized sorters to divert reusable covered products for sale in secondhand markets.
- 12) Requires the PRO, within 12 months of the effective date of the regulations, to develop and submit a complete plan to CalRecycle. Requires the stewardship plan to cover the collection, transportation, repair, sorting, recycling, and the safe and proper management of covered products in the state, as specified. Prohibits a PRO from limiting the stewardship plan to covered products of the producers participating in the program. Requires CalRecycle to review and approve, disapprove, or conditionally approve the plan within 120 days of receipt.
- 13) Requires, by July 1, 2030, “program operators” to have a complete plan approved by CalRecycle and requires that each producer to be subject to an approved plan. Requires, within three months of the approval of a plan, the program operator to begin to implement the plan and to fully implement the plan within 12 months.
- 14) Requires a plan to be designed to accept and manage all postconsumer covered products and include:
 - a) The names and contact information of producers and brands of covered products covered by the plan;
 - b) A description of the method to establish and administer a means of fully funding the PRO in a manner that distributes the costs among producers using a per unit eco-modulated fee that reflects California sales volumes and the cost of reuse, repair, recycling, and otherwise managing covered products;
 - c) A five-year budget that fully funds the stewardship program;
 - d) Quantifiable five-year and annual performance standards and metrics until CalRecycle publishes performance standards;
 - e) A description of how the PRO will provide for a free and convenient drop-off or collection system for covered products in each county and how the collection sites will be authorized and managed;
 - f) A description of the process by which collected covered products will be sorted, transported, processed, repaired, reused, and recycled, as specified;
 - g) A description of how collection sites will be authorized and managed, as specified;
 - h) A description of the process by which collected covered products will be sorted, transported, processed, reused, and recycled following collection, as specified;
 - i) A comprehensive statewide education and outreach program to educate consumers and promote participation in the program, as specified;

- j) A description of the strategies, goals, and metrics the PRO will use to annually assess and evaluate the efficacy of the comprehensive statewide education and outreach program;
 - k) A description of efforts to coordinate with specified entities;
 - l) Information to the public on secondhand markets and the benefits of reuse, including repair;
 - m) A requirement that the statewide education and outreach campaign to promote the safe and proper management of covered products;
 - n) Coordination with, and a description of the efforts and methods used to coordinate activities with, other PROs, existing collection and recycling programs, and community-based organizations;
 - o) A contingency plan in the event the plan expires or is revoked;
 - p) Develop a program in coordination with other program operators to support laundries for laundering covered products;
 - q) A description of how the plan will address per- and polyfluoroalkyl substances (PFAS) and other chemical contamination;
 - r) Develop strategies to address design challenges for covered products;
 - s) A description of how the PRO will minimize the negative environmental impacts of all operations associated with the plan; and,
 - t) A process by which the financial activities of the PRO or individual producers that are related to implementation of the plan will be subject to an independent audit.
- 15) Requires producers of covered products sold, offered for sale, imported, or distributed in or into the state to achieve the performance standards set by the PRO. Authorizes CalRecycle, after March 1, 2032, to establish, review, and adjust performance standards based on information included in the plan, annual reports, and other information provided by the PRO, CalRecycle waste characterization studies, the needs assessment, and economic and any other relevant information.
- 16) Requires the PRO to review the plan at least every five years after approval and determine what revisions may be necessary. Establishes a process for plan revisions.
- 17) Requires the PRO to pay all administrative and operational costs associated with establishing and implementing the program in which it participates, including the cost of collection, transportation, sorting, repairing, recycling, and the safe and proper management of covered products.
- 18) Requires the PRO to establish a method for fully funding the PRO in a manner that distributes the program's costs among participating producers that reflects sales volumes and the eco-modulated fee criteria included in the plan.

- 19) Establishes the Textile Stewardship Recovery Fund for the purpose of implementing enforcing the bill's requirements.
- 20) Requires the PRO to retain an independent public accountant to annually audit the accounting books of the PRO, which must be included as part of its annual report. Authorizes CalRecycle to conduct its own audits.
- 21) Requires the program operator to submit an annual report to CalRecycle that includes specified information. Requires the annual report to include the annual audit and:
 - a) The PRO's costs and revenues;
 - b) A summary of anticipated changes to allocations for the next calendar year;
 - c) The amounts of the eco-modulated fees;
 - d) The producers participating in the plan and an updated list of the names and contact information;
 - e) The amount of covered products sold in or into the state by producers covered by the plan broken down by fiber type;
 - f) A list of the PRO's collection sites;
 - g) The total weight of covered products, by category, collected and deemed reusable;
 - h) A list of each authorized sorter, repair business, and textile article recycling facility;
 - i) An updated list of the names and contact information for producers and brands covered under the plan;
 - j) The total weight and number of covered products sold in or into the state attributed to a producer covered by the plan that are collected and reused or recycled by the PRO;
 - k) A complete accounting of the ultimate disposition of all covered products collected by the PRO;
 - l) A description of how the PRO provided incentive payments, grants, and market development incentives to support infrastructure;
 - m) A report on how the PRO prioritized the use of sorting and recycling facilities located closer to the point of generation to minimize transportation cost and increase accountability;
 - n) An analysis of whether the PRO met the performance standards; and,
 - o) A description of how the PRO addressed PFAS and other chemical contamination.
- 22) Authorizes CalRecycle, after March 1, 2032, to establish, review, and adjust the performance standards and the dates by which they must be achieved.

- 23) Requires CalRecycle, within 12 months of the effective date of the regulations, and on or before July 1 thereafter, to post a list of compliant producers, brands, and covered products. Requires retailers, importers, and distributors to monitor the list and prohibits the sale of noncompliant products. Authorizes the sale of existing inventory in stock before the before the initial list was posted by CalRecycle.
- 24) Establishes administrative civil penalties of up to \$10,000 per day, and up to \$50,000 per day for intentional or knowing violations. Requires CalRecycle or the court to consider specified factors when determining the amount of a penalty. Requires CalRecycle to establish an informal hearing process. In addition to assessing penalties for violations, authorizes CalRecycle to revoke a PRO's plan approval.
- 25) Establishes anti-trust immunity for PRO actions and provides justification for limitations on the public's access to specified information.
- 26) Specifies that nothing in the bill grants any city, county, city and county, special district, or joint powers authority with any new authority over solid waste handling or solid waste franchise agreements.
- 27) Requires online marketplaces to annually:
 - a) Notify CalRecycle and the PRO of all third-party sellers with sales of covered products over \$1 million in the preceding year and provide required information; and,
 - b) Provide all third-party sellers with information on the requirements of law as provided by the PRO.
- 28) Defines terms used in the bill, including:
 - a) "Apparel as clothing and accessory items intended for regular wear or formal occasions and outdoor activities. Specifies that for purposes of the bill, "apparel" includes only undergarments, shirts, pants, skirts, dresses, overalls, bodysuits, costumes, vest, dancewear, suits, saris, scarves, tops, leggings, school uniforms, leisurewear, athletic wear, sports uniforms, everyday swimwear, formal wear, onsies, bibs, footwear, handbags, backpacks, knitted and woven accessories, jackets, coats, snow pants, ski pants, and everyday uniforms for workwear. Specifies that "apparel" does not include personal protective equipment or clothing items for use by the United States military, personal protective equipment worn to protect the wearer from health or environmental hazards, and reusable products designed to collect and absorb urine and feces or reusable products regulated by the United States Food and Drug Administration that are designed to collect and absorb menstruation or vaginal discharge.
 - b) "Brand" as a trademark, including both a registered trademark and an unregistered trademark, logo, name, symbol, word, identifier, or traceable mark that identifies a covered product and identifies the owner or licensee of the brand.
 - c) "Covered product" as an apparel or textile article. Excludes products covered by the Used Mattress Recovery and Recycling Act, the Electronic Waste Recycling Act, the Product Stewardship for Carpets Law, or an automated, motorized, battery, or manual window covering.

- d) “Importer” as either:
 - i) A person qualifying as an importer or record, as specified; or,
 - ii) A person importing into the state for sale, distribution for sale, or offering for sale in the state a covered product that was manufactured or assembled by a company physically located outside of the state.
- e) “Online marketplace” as a consumer-directed, electronically accessed platform for which all of the following are true:
 - i) The platform includes features that allow for, facilitate, or enable third-party sellers to engage in the sale, purchase, payment, storage, shipping, or delivery of a consumer product in the state;
 - ii) The features above are used by third-party sellers; and,
 - iii) The platform has a contractual relationship with consumers governing the use of the platform to purchase consumer products.
- f) “Producer” as a person who manufactures a covered product and who owns or is the licensee of the brand or trademark under which that covered product is sold, offered for sale, or distributed for sale in the state. If there is no person who meets this requirement, the producer is the owner of a brand or trademark or the exclusive licensee of a brand or trademark, regardless of whether the trademark is registered. If there is no person who meets these requirements, the producer is the person that imports the covered product into the state for sale or distribution. If there is no person who meets these requirements, the producer is the distributor, retailer, or wholesaler who sells the product in or into the state. Specifies that the sale of a covered product is deemed to occur in the state if the covered product is delivered to the consumer in the state. Excludes from this definition sellers that only sell secondhand covered products and sellers with less than \$1 million in annual aggregate global turnover, as specified.
- g) “Producer responsibility organization” as an organization exempt from taxation under Section 501(c)(3) of the federal Internal Revenue Code that is formed for the purpose of implementing a plan to meet the requirements of the Act, and is approved by CalRecycle.
- h) “Recycle” or “recycling” as having the same meaning as set forth in PRC 42041 (aa), excluding references to plastics and as otherwise applicable.
- i) “Stewardship program” as a program established by a PRO pursuant to the Act for the free, convenient, and safe collection, transportation, repair, recycling, and otherwise proper management of covered products.
- j) “Textile article” as any item customarily used in households or business that are made entirely or primarily from a natural, artificial, or synthetic fiber, “yard,” or fabric.

FISCAL EFFECT: Unknown

COMMENTS:

- 1) **Textile waste.** According to CalRecycle's 2020 *Facility-Based Characterization of Solid Waste in California* report, textiles, including apparel, fabric, and textile articles (such as linens, curtains, etc.) were the sixth most prevalent material type disposed of by single-family residences in 2018. Overall, Californians disposed of nearly 1.2 million metric tons of textiles in 2018, making up about 3% of California's total waste stream.

The generation of textile waste has been supercharged by the rise of fast fashion. "Fast fashion" is an approach to the design, creation, and marketing of clothing that emphasizes making fashion trends quickly and cheaply available to consumers. Retailers and producers benefit from frequently updating styles to incentivize shopping. Fast fashion contributed to a global doubling of clothing production from 2000 to 2014. Fast fashion provides clothes to consumers for lower prices but sacrifices the quality and longevity of garments in the process, leading to more waste.

Dealing with all this waste is expensive; in 2021, California ratepayers paid more than \$70 million dollars in disposal costs. Textile waste comes with a carbon cost as well; textile and garment industries account for between 6-8% of total global carbon emissions, or some 1.7 billion tons in carbon emissions per year.

- 2) **Managing waste textiles.** According to CalRecycle, 95% of California's textile waste is reusable or recyclable, meaning that the textiles are in a condition that allows them to be reused, or that still have tags identifying the materials used. Tags are critical for textile recycling in order to identify the material type.

Both reuse and recycling for used textiles begin when textiles are discarded, either when businesses toss out scrap or surplus material, or when consumers dispose of old clothes or textile household items, like sheets, curtains, and pillows. Once these materials have been collected, they can be sorted to separate reusable material from material that is only eligible for recycling or landfilling.

According to CalRecycle, only 10-15% of garments donated or sold to second-hand markets are directly resold in the stores where they are collected. Of the remaining material, 30% is cut down to rags, 20% is converted into recycled fibers for uses such as carpet padding, insulation, and pillow stuffing, 5% is landfilled in the state, and 45% is sent overseas for further processing or eventual disposal. Items that are sent overseas may or may not have a second life. For example, of the 15 million used garments that flow into Ghana every week, an estimated 40% are deemed worthless upon arrival and landfilled. This off-shore landfilling comes at a high carbon cost, since shipping overseas is a carbon-intensive process.

Recycling textiles is a multistep process. Natural fibers are mechanically processed. For example, cotton textiles are shredded, the fibers are separated, and then re-spun with virgin fibers into yarn to make new textiles. Synthetic fibers, such as polyester, can sometimes be mechanically processed by shredding, cleaning, molding into pellets, and then extruding into new fibers. If mechanical processing is not possible, the textiles can also undergo the more intensive process of chemical processing, where the synthetic material is broken down into its component molecules to remove contaminants and then reformed into fibers. Blends of materials, either different types of natural fibers, synthetic fibers, or both, are typically not

eligible for chemical processing, but can be mechanically processed and downcycled into composite materials, such as thermal insulation or carpet for use in the building industry.

The current recovery rate for textiles in the United States is approximately 15%, while the remaining 85% of discarded clothing and textiles are sent to landfill or incineration. Just 1% of recycled clothes are turned back into new garments, which is the gold standard for a circular economy.

- 3) **Pilot programs.** According to the bill’s sponsor, the California Product Stewardship Council (CPSC), there are various textile recycling pilot projects underway or completed in San Francisco, the City of Los Angeles, the County of Los Angeles, and the County of Alameda. Additionally, SB 1187 (Kamlager), Chapter 616, Statutes of 2022, requires CalRecycle to establish a three-year pilot project in the Counties of Los Angeles and Ventura to study and report on the feasibility of recycling fabric; however, this program has not received funding through the Budget process.
- 4) **EPR.** According to CalRecycle, EPR is a strategy that places shared responsibility for end-of-life management for products on the producers and all entities involved in the product chain, instead of entirely on local governments and ratepayers. EPR programs rely on industry, formalized in a product stewardship organization, to develop and implement approaches to create a circular economy that makes business sense, with oversight and enforcement provided by a government entity. This approach provides flexibility for manufacturers to design products in a way that facilitates recycling and to develop systems to capture those products at the end-of-life to meet statutory goals.

There are several key elements that should be carefully evaluated to develop a successful EPR program. These elements are part of CalRecycle’s “EPR checklist” and include considerations of: (1) the scope of the program (what and who is captured in the covered product and PRO universe); (2) requirements for the PRO; (3) funding for the program; and, (4) oversight for the program.

5) **Author’s statement:**

The fashion industry is considered a top industrial polluter, accounting for approximately 10% of global carbon emissions. As textiles decompose, they emit high levels of methane gas, a major contributor to global warming. The phenomenon of “fast fashion,” which revolves around the marketing and sale of low-cost, low-quality garments that go out of vogue with increasing speed, is a major contributor to this alarming environmental trend.

A well-designed and effectively administered statewide textile [EPR] program has the potential to develop previously untapped or underutilized upcycled and recycled clothing and fiber markets, as well as to support ongoing efforts to encourage the repair and reuse of clothing and other textiles in California. In so doing, SB 707 will facilitate a transition to a sustainable, market-aligned, circular economy for textiles that will unlock new production and consumption opportunities to the benefit of the environment, all at a relatively low cost to both the state and consumers alike.

- 6) **The big picture.** This bill is intended to create a statewide EPR program to manage the volumes of textile waste generated in California. The program would require producers, through a PRO, to design and implement a program to collect and recycle, reuse, repair, or otherwise properly manage textile wastes, including apparel, linens, and accessories.
- 7) **Details matter.** This bill establishes a broad framework for an EPR program, including the basic components of an EPR program, but leaves the details open for the PRO or CalRecycle to develop through the plan or as part of the regulations.

This bill models the definition of producer after prior EPR legislation, which starts with the brand owner and steps down to the importer or retailer to ensure that there is an entity located within the state that is responsible for ensuring compliance with the bill's requirements. This has worked well previously, but it may not be able to capture many fast fashion producers, as a significant portion of fast fashion apparel is shipped directly to in-state consumers from companies located overseas. These products would be collected and managed by the in-state program operators, but it may be difficult, if not impossible, to enforce the requirements on overseas producers.

The bill appears to include commercial entities that rent textiles, such as uniforms, medical gowns, and commercial linens, which are collected, laundered, and reused repeatedly. At the end of the useful life, the textiles are generally repurposed for industrial uses, such as rags and insulation. The author may wish to consider whether entities that are participating in reuse activities should be included as producers or not.

This bill establishes clear metrics for collection sites, requiring the PRO to provide at least 10 collection sites per county, or one collection site for every 25,000 people, whichever is greater. As drafted, the PRO would have to collect all materials covered by the bill, whether or not their stewardship plan covers all covered products. This is important to ensure convenience for consumers, but may be somewhat challenging for program operators if there are multiple plans covering different covered products.

This bill does not establish collection or recycling goals or timelines. Instead, the bill requires the PRO to establish five-year and annual "performance standards and metrics" until CalRecycle adopts a performance standard when it reassesses the program's regulations in 2032.

- 8) **Suggested amendments:** *The committee may wish to make the following amendments to the bill:*
 - Clarify PRO responsibility to approve collection sites.
 - Clarify the definition of recycling.
 - Make a number of organizational, technical, and clarifying changes.

REGISTERED SUPPORT / OPPOSITION:

Support

5 Gyres Institute
A Voice for Choice Advocacy
Ambercycle
Aquafil Carpet Recycling
Association of California Goodwills
BASF Corporation
Boardrider
California Environmental Voters
California Product Stewardship Council
Californians Against Waste
CALPIRG
Castro Valley Sanitary District
CBU Productions
Center for Oceanic Awareness, Research, &
Education
Changing Markets Foundation
Circ, INC.
Cirtex
City of Alameda
City of Roseville
City of San Jose
City of Sunnyvale
City of Thousand Oaks
Clean Brands
Climate Reality Project, Los Angeles
Chapter
Climate Reality Project, San Fernando
Valley
County of Santa Barbara
Coyuchi
CRRA
Delta Diablo
Democrats of Rossmoor
Eco New Upcycled
Eco-Catalyst, Inc.
Ellerali
Environmental Working Group
Everlane
Fashion Revolution USA
Fibershed
Fort Ord Environmental Justice Network
Friends Committee on Legislation of
California
Full Circle Environmental
Grace Veterinary, Inc.
Greenwaste Recovery
Haelixa
Heal the Bay
Ikea
Intrinsic Advanced Materials, LLC
JDG Group, Inc.
Laci
Le Marche Limited
Luna Lab
Lymi, Inc. DbA Reformation
Mara Hoffman
Marmot
Materevolve
Mend It, Inc.
Mojave Desert and Mountain Recycling
Authority
Molte Volte
National Stewardship Action Council
Northern California Recycling Association
Ocean+Main
Operations Reformation
Ouros Industries
Outerknown
Plastic Oceans International
Plastic Pollution Coalition
Plsreturnit Inc.
Product Stewardship Institute
Project Ropa
R3 Consulting Group, Inc.
Ravel
Recology
Renewcell
Repeat Reuse, Inc.
Republic Services
Resource Recovery Coalition of California
Rethink Waste
Roboro
Rural County Representatives of California
Salinas Valley Solid Waste Authority
Santa Barbara Count Resource Recovery
and Waste Management Division
Santa Barbara County Solid Waste Local
Task Force

Santa Clara County Recycling and Waste
Reduction Commission
Savers
Scullyspark
Sea Hugger
Seventh Generation Advisors
Sew You, LLC
Sierra Club California
Sixone Labs LTD
Social Compassion in Legislation
Sohocolab
Solana Center for Environmental Innovation
Solid Waste Environmental Excellence
Performance Standard
Sortile
South Bayside Waste Management
Authority DbA Rethinkwaste
St. Catherine University
Stand Up to Trash

Stopwaste
Surfrider Foundation
Sustainable Works
The Center for Oceanic Awareness,
Research, and Education
The Fashion Connection
Threadhous Co.
Upcycle It Now
USAgain
Western Placer Waste Management
Authority
Wishtoyo Chumash Foundation
Zero Panik
Zero Waste Company
Zero Waste San Diego
Zero Waste Sonoma
Zero Waste USA

Opposition

Accelerating Circularity, Inc.
American Apparel & Footwear Association
American Circular Textiles Group
California Chamber of Commerce
California Manufacturers and Technology Association

Analysis Prepared by: Elizabeth MacMillan / NAT. RES. /