

January 12, 2021

Department of Resources **Recycling** and Recovery (**CalRecycle**)
P.O. Box 4025.
Sacramento, CA 95812-4025

Dear CalRecycling:

Our residents of Humboldt Co. no longer have a Certified Recycling Center, and as a result, no viable location to return their beverage containers for CRV. The law requires a Certified Recycling Center be located within a convenient radius of affected retail outlet for the benefit of consumers. Our closest Certified Recycling Center is located in Crescent City.

Under an Executive Order issued by Governor Newsom last spring, recycling redemption centers received a temporary reprieve from accepting CRV materials due to the COVID-19 pandemic. This temporary reprieve ended on August 21, 2020 and the Governor refused to grant any further extensions. The ideal solution, according to CalRecycle, “is for a state certified recycling center become operational within the convenience zone.”

Following an ultimatum to reopen immediately, face violations, or decertify. Humboldt Waste Management Authority (HWMA) opened redemption services for three days but had to shut down due to traffic congestion to area streets and Highway 101, adverse impacts to area business owners and lack of access for emergency response.

Humboldt Waste Management Authority (HWMA) pleaded with CalRecycle to temporarily allow CRV redemption by appointment in an effort to control inbound traffic and material volume. CalRecycle informed HWMA that appointments are not permissible. HWMA reluctantly submitted its notice of decertification on September 17th, 2020.

The inability of CalRecycle to approve temporary appointment allowances or provide viable assistance to struggling CRV redemption sites and centers that resulted in their decertification has effectively created a tax to the residents of Humboldt County. Consumers are charged CRV deposit fees they cannot reasonably redeem, and now small businesses will be taxed at a rate of \$100 per day for failure to create a redemption center.

On October 22, 2020, after revoking a previous exemption, local retailers in Humboldt County received a first notice from CalRecycle requiring retailers to begin accepting empty CRV beverage containers at the end of a 60-day grace period or face fines of \$100.00 per day.

During this “grace period” local retailers were encouraged to “work with property managers, local government, and recycling center operators to establish a recycling center in our area”.

With the recent decertification of all local CRV buyback centers, residents in Humboldt are unable to redeem their beverage containers and collect their CRV deposits.

This very unfortunate development resulted in notification by CalRecycle that we no longer have a certified recycling center within our convenience zones, and as retailers, we now have the burden of developing the necessary infrastructure to accept and redeem CVR recyclables, transporting those containers to a certified recycling location. In Humboldt county our closest option is 80 miles away, a four hour round trip. All this within a 60-day time frame.

In addition to the logistical hardship placed on local retailers by this most recent action by CalRecycle, we have an obligation to our employees, qualified as “essential workers”, and the safety of our customers, not only morally, but under California Governor Executive Order N-54-20 to take necessary and mandated precautions to reduce the risk of exposure to Covid-19. With Covid-19 cases once again on the rise, we cannot justify taking additional risk of virus spread.

At this time, we respectfully disagree with the only two options presented by CalRecycle and are unable to comply with either of the two options presented to us. Fining local business \$100 a day for failing to create a redemption center does not promote recycling nor does it allow consumers to recoup CRV.

We, as a community respectfully request CalRecycle to recertify our local recycling centers and allow CRV redemption on an appointment basis until, working together, with local recyclers, beverage dealers, and ultimately consumers, we can determine a longer term more viable solution. By simply allowing our local recycling centers to accept CVR on an appointment basis we avoid undue hardship and potential Health risks to our Communities.

Local recycling centers remain willing to be certified if they can secure temporary allowances such as appointments to manage inbound traffic and customer volume, increase daily allowable limits to pre-2014 volumes to address the backlog of stored material, and handling fees to help financially struggling redemption buyback centers.

Sincerely,

Humboldt County Grocers