



The Association of Plastic Recyclers



November 8, 2017

Ms. Deborah Halberstadt
Executive Director
California Ocean Protection Council
1416 9th Street, Suite 1311
Sacramento, CA 95814

Re: Second Workshop on the Updated Draft California Ocean Litter Prevention Strategy

Dear Ms. Halberstadt:

Our organizations are concerned with the current public process being used by the California Ocean Protection Council (OPC) to finalize the draft update to the *California Ocean Litter Prevention Strategy: Addressing Marine Debris from Source to Sea* which was originally developed in 2008. Our concern stems from the selective nature of the stakeholders invited to participate in the invite-only second “public” workshop scheduled for November 15 and 16, 2017, in La Jolla, California.

Many of the undersigned organizations have been active participants on issues related to marine debris for many years. The issue of recycling and the need to continue to build upon California’s current recycling infrastructure is a priority for our organizations. Similarly, implementation of

the State Water Resources Control Board recently adopted Trash Policy is also a priority. We believe that enhancing California's recycling infrastructure while installing structural devices to capture trash before entering the state's waterways will go a long way in helping stem the marine debris issue.

Based on our collective knowledge of recycling and our direct participation in the development of the Trash Policy, we are concerned with the lack of regulated industries invited to participate in the final opportunity to participate and "volunteer for a lead or partner role in implementing proposed actions" related to the draft strategy. And, since the OPC is planning on having participants at the November 15-16, 2017 workshop "vote on the ocean litter priority strategies, and the top strategies coming out of that process will be identified" in the final strategy, the OPC has pre-determined the outcome of priorities by the lack of industry invitation and participation to the workshop.

Our organizations respectfully request that the OPC expand its list of invited participants to those stakeholders that would be impacted by the strategies identified in the draft document. We would welcome the opportunity to engage the OPC and other stakeholders to identify opportunities for collaborative efforts that can help address the marine debris issue – provided that such efforts are balanced, economically and environmentally sustainable, and represent real reductions in overall marine debris/trash loads.

Sincerely,

American Institute for Packaging and the Environment
California Building Industry Association
California Business Properties Association
California Chamber of Commerce
California League of Food Producers
California Manufacturers and Technology Association
California Restaurant Association
California Retailers Association
Industrial Environmental Association
National Federation of Independent Business
Plastics Industry Association
The Association of Plastics Recyclers
Valley Industry Commerce Association
Western Plastics Association