



April 6, 2022

Jack Macy
Commercial Zero Waste Senior Coordinator
San Francisco Department of the Environment
1455 Market St # 1200
San Francisco, CA 94103

Re: SB 1383 Compostable Plastics Notification

Dear Mr. Macy,

This letter is in response to your email on March 15, 2022, requesting that Recology Blossom Valley Organics North (RBVON) provide written notification that the facility can process and recover compostable plastics.

Sections 18984.1(a)(1)(A) of the regulations adopted by CalRecycle in November 2020 under Senate Bill 1383 states that compostable plastics can be placed in the green container if the material is transported to a facility that has provided written notification that the material can be processed and recovered.

As discussed with the San Francisco Department of the Environment, due to the nature of compostable plastics and the processing conditions at most industrial composting facilities including RBVON, compostable plastics do not break down. Current standards for certifying compostable plastics – such as ASTM D6400 – do not align with actual facility conditions, such as processing times. Therefore, RBVON cannot state that these materials can be “processed and recovered.”

We understand that since compostable plastics are non-recoverable, San Francisco may need to remove plastics and plastic bags marketed as “compostable” from its organics collection program to comply with this recent change in state law. Recology is happy to partner with San Francisco to help facilitate this change, understanding that it will take time to implement.

During this transition period RBVON will continue to accept the organics stream from San Francisco, though we cannot guarantee recovery of compostable plastics in this stream. A timeline should be agreed upon for this transition period to ensure progress is made within a reasonable amount of time.

SB 1335, which requires state food service facilities to serve prepared food with food service packaging that is reusable, recyclable, or compostable, may also serve as a benchmark for the allowance of compostable plastics. Under SB 1335, compostable packaging must be accepted by at least 50 percent of compost facilities to be included on the SB 1335 Materials List.

CalRecycle staff recently conducted a survey of 26 compost facilities in the state. Out of 17 responses, only 3 compost facilities responded that they accept compostable plastics. As a result, compostable plastics cannot be included on the SB 1335 Materials List and will not be allowed in state food service facilities.

The results of the CalRecycle SB 1335 survey, as well as the recent passing of AB 1201, have signaled that further action is needed to regulate compostable plastics and evaluate their full life cycle and impact on the environment.

As a statewide leader in advancing programs that support and protect the environment, we encourage the City of San Francisco to lead this paradigm shift and join with Recology and other key stakeholders to find a sustainable solution. Until this occurs, Recology urges San Francisco to join other jurisdictions across CA in disallowing these materials in their organics collection program.

If you have any questions or need further information, please feel free to contact me at GPryor@Recology.com or (707) 249-1703.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Greg Pryor', is positioned above the typed name and title.

Greg Pryor
General Manager
Recology Blossom Valley Organics – North