



# Reuse Alliance

3255 Santa Rosa Ave  
Santa Rosa, CA 95407  
[www.reusealliance.org](http://www.reusealliance.org)

California Air Resources Board  
1001 I Street Sacramento, CA 95814

Re: Draft Priority Climate Action Plan

February 9, 2024

Dear CARB,

We are writing to advocate for REUSE INFRASTRUCTURE to be added as measure #3 under the Waste Section of the Priority Climate Action Plan. We were pleased to see the inclusion of an Edible Food Recovery Program in the plan, which is one form of reuse. But there are many more sectors that require significant investment to move us closer to a Circular Economy.

Reuse is a primary method of source reduction, and the first phase of a circular economy, with material flows continually looping through the reuse system. In a circular system, materials are designed for reuse and are regenerative. Reuse includes the following sectors:

- reuse retail & rescue
- refill
- repurposing
- repair
- remanufacturing
- refurbishing
- reupholstering
- upcycling.

When a material reaches the end of its primary use, it should move to the next phase of a reuse economy which might also be another form of reuse such as repair or remanufacturing. Only after a material has exhausted these first 2 phases and their loops should it be composted or recycled. Investment in Reuse Infrastructure is critical to the transition to a circular economy, and California has not focused on funding reuse in any significant way. This oversight can be easily remedied by placing Reuse as a Measure in the California Priority Climate Action Plan.

Without investment now in reuse, a circular economy will never come to fruition because the current linear waste focused system will be allowed to develop further unchecked. This is why we continue to fail to reach California's waste reduction goals. We will remain in a continual waste cycle of fast material consumption to landfilling, combustion, recycling or composting. Before California invested in composting and recycling, it should have invested in Reuse. Our sector is a working sector with zero government incentives or funding mechanisms like franchise agreements, grants or subsidies. We have not been mandated as a utility like the waste sector. This needs to be remedied immediately if we are serious about reducing the effects of climate change.

The recently enacted SB 54 requires 4% reuse of packaging and foodware by 2032. However, the development of reuse infrastructure in California is so far behind other industrialized countries that it is hard to imagine how we can get there in just 8 short years without inclusion as a priority in the Climate Action Plan.

CARB recently invested in a wood reuse calculator. Let's update it and put it to use by developing and funding programs that can produce data. Per ton, the Environmental Protection Agency Warm calculator shows that wood reuse reduces MTCO<sub>2</sub>E by a factor of 2 over landfilling and over a factor of 3 from combustion. In order to move wood reuse from being performed by small businesses to large-scale operations that can handle a higher % of the wood waste stream, we must invest in innovative businesses willing to scale to the next level.

Nearly 1/3 of organic waste is dimensional and other lumber and wood products, and there is likely a high percentage of wood waste in the 1.5 million pounds of California's bulky waste. Meeting SB1383's requirement of 75% diversion of organic waste by 2024 will not be possible with the limited current CalGreen code which does not require any organic waste be recycled or reuse at all. The 65% rule in CalGreen is easily met by most construction projects with concrete alone, thus most wood is chipped and used for alternative daily cover for landfills or is sent to biomass plants.

Lastly, we believe that using the term "Waste" as a Heading for GHG Measures in climate action plans is outdated, and deserves some discussion and attention for the next round of the Climate Action plan.

Best, 

Nicole Tai  
Chair of the Board  
Reuse Alliance