

SUMMARIZED STAKEHOLDER COMMENTS ON OCEAN PROTECTION COUNCIL OCEAN LITTER PRIORITIES HANDOUT

At the second workshop, the Ocean Protection Council (OPC) provided a handout outlining proposed priorities for the agency to address ocean litter. OPC solicited preliminary comments on the priorities from workshop participants and stakeholders on the email list. Below is a summary of the comments received on the OPC priorities outline.

Commenting Organization	Summary
Keep America Beautiful	<ul style="list-style-type: none"> Requested research on littering behavior to ID sources of litter.
California State University, COAST	<ul style="list-style-type: none"> Requested that the recommendation for product prohibition to be broader than expanded polystyrene; suggested language to revise the product prohibition item. Requested clarification on the term "leashing the lid" and would like more clarification on OPCs role in that effort.
City of Watsonville	<ul style="list-style-type: none"> Requested that OPC to consider other regulatory mechanism timelines, like the trash amendments and AB1826 (the organics mandate), when considering implementation timelines to achieve their goals. Requested that OPC consider making the phase-out of single-use products in public institutions a part of the trash amendment requirements for a local jurisdiction’s stormwater permit. The City of Watsonville is interested in support for small jurisdictions to pass Extended Producer Responsibility (EPR) ordinances through regional efforts. Commented that EPR seems more effective when local governments take a regional approach. Requested identification of when California produces massive quantities of litter as a state (e.g. Independence Day), and consideration of whether EPR could be used to address waste from fireworks and small-scale explosives. Noted that fireworks are used locally for agricultural purposes to scare birds away from crops. Requested that OPC add actions relating to agriculture and plasticulture as a source of ocean litter. Requested that additional ocean litter items be more clearly outlined beyond food packaging and expanded polystyrene, for example, calling out specific types of foodware, microplastics, and fishing gear. Requested consideration of the classification of toxic or hazardous waste as it relates to specific items (e.g. cigarette butts, plasticizers, fireworks). Requested that OPC fund research to identify toxicity of agricultural plastics in the watershed, which may be contaminated by pesticides, fumigants, etc. Requested that OPC equip jurisdictions with information about point source microplastics specific to their area and a public education framework about microplastics.

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	<ul style="list-style-type: none"> • Requested that OPC fund research to consider the point at which treated water is used again and the impacts of microplastic/microfiber loading of treated water on agricultural fields and other environments. • Requested consideration of how to delineate public outreach related to purchasing clothing without plastic to the idea that we have been telling consumers that sustainable purchasing is buying second hand. Are we interested in throwing out second hand clothing with plastic and microfibers? Would communities with less resources be able to purchase plastic-free clothing at their price point? • Recommended adding education and outreach as an added priority or sub-action to each of the priorities.
American Chemistry Council	<ul style="list-style-type: none"> • Recommended that the priorities focus on new recycling infrastructure, consumer education, and waste management in the priorities. Commented that replacements for plastics use up more natural resources (water, GHGs, etc.) than plastics, and that banning products only switches litter composition, it does not end litter or marine debris. • Requested that the priority to change State service contracts and institutional purchasing to reduce the use of single-use foodware be deleted. • Requested that the priority to recommend the prohibition of expanded polystyrene be deleted.
California Business/Industry Coalition: American Institute for Packaging and the Environment; California Building Industry Association; California Business Properties Association; California Chamber of Commerce; California Manufacturers and Technology Association; California Restaurant Association; California Retailers Association; Consumer Specialty Products Association; Los Angeles Area Chamber of Commerce; Plastics Industry Association; Valley Industry Association; Western Plastics Association	<ul style="list-style-type: none"> • Recommended that OPC focus on building up solid waste and stormwater infrastructure. • Requested that the priority to change State service contracts and institutional purchasing to reduce the use of single-use foodware be deleted. • Requested that the priority to promote extended producer responsibility as a waste management approach to address common ocean litter items be deleted. Requested that the additional priority to support CalRecycle’s inclusion of expanded polystyrene as a priority product to be addressed in the packaging reform framework also be deleted. • Requested that the priority to recommend a prohibition of expanded polystyrene in foodware and other common ocean litter items be deleted. • Requested that the priority to determine whether additives associated with microfibers may cause impacts to the marine environment include language stating “research shall be based on best available data and the development of such studies shall include stakeholders to ensure their integrity.” • Requested that the priority to determine whether reformulated textiles can significantly reduce the loading of microplastics into wastewater effluent include language stating “research shall be based on best available data and the development of such studies shall include stakeholders to ensure their integrity.”

Commenting Organization	Summary
<p>California Association of Sanitation Agencies; Bay Area Clean Water Agencies; Southern California Alliance of Publicly Owned Treatment Works</p>	<ul style="list-style-type: none"> Recommended establishing robust monitoring methods before developing and funding the proposed comprehensive research plan under the Microplastics/Microfibers draft priority. Recommended that key components of the research plan should include the developed and validated sampling and analysis methods, characterization of types of microplastics, concentrations, pathways, risk assessment, impacts, and source control. Specific language changes were suggested in the comment letter.
<p>San Francisco Estuary Institute; Southern California Coastal Water Research Project</p>	<ul style="list-style-type: none"> Indicated interest in co-leading stakeholder action item 4.2.2 "Develop standardized monitoring/data collection and compliance methods for trash and microplastics, including methodologies for measuring reductions of litter." Indicated interest in co-leading stakeholder action item 4.3.1 "Research wastewater effluent to identify and quantify microfibers and microplastics." For OPC Priorities, recommended that standardizing methodologies should also occur for sediment, key biotic matrices, like fish and bivalves. Noted that improved understanding of the sources and pathways of microplastic pollution is also critical to identify and prioritize management actions, and recommended that the priorities include polymer identification.
<p>Clean Seas Coalition; Surfrider Foundation; California Coastkeeper Alliance; Plastic Pollution Coalition; Heal the Bay; UPSTREAM; Californians Against Waste; The Last Plastic Straw; California Product Stewardship Council; The 5 Gyres Institute; Clean Water Action; Seventh Generation Advisors; Mass Green Network; The Story of Stuff Project</p>	<ul style="list-style-type: none"> Recommended that timelines and concrete goals be associated with the land-based ocean litter priorities. Also recommended a call-out that land-based ocean litter is 80% of the ocean litter problem. Requested more OPC focus and actions under the ocean litter section. Requested that any mention of EPR be paired with the idea that the goal of EPR should be source reduction and requiring producers pay for the externalities they cause, and not increased recycling. Requested that the item stating that OPC would fund comprehensive characterization of litter inputs to State waters be reframed to have OPC assess existing data sets, and see if gaps still need to be filled on litter movement and characterization within a watershed. Suggested that plasticizers and antimicrobials be added to fluorinated compounds for research of chemical additives to ocean litter. Requested a new action saying that OPC would provide funding for programs that reduce land-based sources of marine litter. Requested that the goal for "Fishing and Aquaculture Gear" be renamed to "Ocean-based marine litter." Requested language changes in "provide best available science and information to the California Department of Fish and Wildlife (CDFW) and the California Fish and Game Commission (FGC) as they work to develop improved fishing and aquaculture gear management," to indicate two-way information sharing between OPC and CDFW/FGC.
<p>Richard James, aquaculture activist</p>	<ul style="list-style-type: none"> Provided a set of proposed Best Management Practices for the Aquaculture Industry.

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UC Riverside	<ul style="list-style-type: none"> • Encouraged OPC to fund modeling and analysis to optimize Caltrans’s highway cleanup program to cleanup places that have the most litter. • Suggested that goal 3 be broadened to address degrading coastal infrastructure in addition to fishing and aquaculture gear. • Asked if product redesign initiatives will include engineering innovations such as "think beyond plastics." • Supported the inclusion of litter input and transport research as well as microplastics and microfibers research. Commented that research on microplastics concentration must continue within a flux-based framework. • Expressed concern that actions taken to address polyester fibers may not be enough, as polyester is likely transported throughout the lower atmosphere. • Discussed the need for a central, standardized repository for litter cleanup and monitoring as well as microplastics data.
California Product Stewardship Council	<ul style="list-style-type: none"> • Provided information on Aquafil, a corporation that has developed a method to recycle nylon carpet, and nylon fishing nets. Aquafil is planning to open a plant in Sacramento and is interested in acquiring fishing nets for recycling in California.