



# Californians Against Waste

Conserving Resources. Preventing Pollution. Protecting the Environment.

April 24, 2018

Holly Wyer, Ocean Protection Council  
Sherry Lippiat, National Oceanic and Atmospheric Administration

**Re: Comments on CA Ocean Litter Prevention Strategy – April 13, 2018 Proposed Final Draft**

Strategy Planning Team,

Thank you for your superb work thus far to draft the 2018 update of California's 2008 Ocean Litter Strategy and for inviting us to participate in the workshops and stakeholder discussions. Californians Against Waste is very pleased with the most recent version of the plan and offers two final points for consideration in the final plan: modification of references to "ocean litter" to "ocean pollution" and an additional objective to study the effects of "marine degradable" products. We look forward to being involved in the continued implementation of this strategy.

In the title of this strategy and in references to the overall strategy scope, several references are made to "ocean litter." In talking about the materials polluting our ocean, their effects and potential remedies, it is equally important to have an accurate picture of the pathways those materials took to enter the ocean. "Ocean litter" connotes human agency and intention behind each piece of pollution and as such does not accurately represent the conclusions drawn in this strategy that ocean pollution derives from numerous sources and is not always the result of intentional consumer negligence. Accordingly, it would be appropriate to change all "ocean litter" references in this report to "ocean pollution." This revision would be more inclusive of all five goals in the plan, especially Goal 2: Reduce the prevalence of common ocean litter [pollution] items through changes in product production, design, and management.

At the November workshops in San Diego, a great deal of concern was expressed about the potential impacts of compostable, degradable, and marine degradable plastics on the marine environment, particularly with respect to Goal 4: Conduct and communicate research on existing and emerging issues related to land-based ocean litter. We believe that source reduction is preferable to transitioning to these materials; however, it will be important to understand the effectiveness of these products and any unintended consequences as they continue to enter the marketplace. Accordingly, we recommend that Objective 4.1.6 be added to the strategy to "research impacts to the marine environment of commonly littered items that are comprised of materials that make claims to be marine degradable, degradable, and compostable."

Changes to Action Sign-Ups: Californians Against Waste would like to be added to Action items 1.1.4, 2.2.3., and 3.2.3. as a partner organization. Californians Against Waste would like to be removed from Action item 2.2.1.

Thank you,

Kelly McBee  
Policy Analyst