



January 9, 2012

Mr. John Laird
Secretary for Natural Resources
Chair, California Ocean Protection Council
California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

RE: Revised Draft Ocean Protection Council Strategic Plan – Comments

Dear Secretary Laird:

The American Chemistry Council (ACC) appreciates the opportunity to submit the following comments relative to the Ocean Protection Council's "Revised Draft Strategic Action Plan." ACC supports the overarching goal of reducing litter and marine debris. We applaud the OPC for including as a specific objective (Objective 10.1, page 21) the support for collaborative efforts and effective partnerships that measurably reducing existing and new marine debris. To that end, we continue to believe that the OPC should focus its attention on all materials that – when improperly littered – can pose potential harm to the environment and marine life.

We believe the following language changes will help clarify the overall intent of reducing and eliminating all forms of marine debris.

Issue 10: Marine Debris

Marine debris was a high priority for the OPC during its first five years, resulting in the adoption of two resolutions, the completion of two scientific studies, and the development of a marine debris implementation strategy.

The OPC's next efforts on marine debris will focus on reducing the amount of ~~plastics and~~ trash that enter the environment. These pollutants persist in the environment and cause long-term negative impacts and harm to wildlife.

The OPC will continue its work to coordinate efforts to reduce ~~plastic~~ marine debris through targeted actions, improved implementation of existing and development of new policies, and greater understanding of this issue among policy-makers.

Objective 10.1: **Support collaborative efforts and effective partnerships that measurably reduce existing and new marine debris.**

Objective 10.2: **Provide information to support implementation of policy initiatives and other efforts to reduce marine debris and its impacts.**

Proposed Actions

- Reconvene the Marine Debris Steering Committee to coordinate statewide efforts to reduce trash in the ocean.
- ~~Work with partner agencies and stakeholders to execute the priority actions identified in the OPC's 2008 Implementation Strategy to Reduce and Prevent Ocean Litter.~~ **Comment: The implementation strategy**



outlined in this document focuses too heavily on only one form of marine debris, without taking into consideration the fact that prohibiting one form of packaging will do little to reduce the overall amount of ocean litter. It makes little environmental sense to implement policies that merely shift the composition of marine debris. ACC believes this proposed action should be deleted.]

- Support the SWRCB and other agencies in adopting and implementing a statewide trash policy and other relevant trash regulations.
 - Work with the State's Ocean Observing Systems, NOAA, and others to track, identify, and prepare for potential California impacts of the debris field from the 2011 Japanese tsunami.
 - Collaborate with a broad array of stakeholders, including industries, to support efforts to reduce marine debris from packaging and other products ~~that contribute to~~ marine debris through product redesign, product stewardship, expanded recycling, and other initiatives.
 - Inform statewide policy discussions related to marine debris by conducting workshops, sharing information, and funding studies such as an economic analysis of marine debris and derelict fishing gear.
 - Identify lessons learned from local or regional efforts to reduce marine debris including local plastic bag ordinances and trash total maximum daily loads (TMDLs).
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Thank you for the opportunity to submit these comments. ACC looks forward to working with the OPC and other stakeholders in the quest to reduce and eliminate all forms of marine debris. Should you have any questions or comments, please do not hesitate to contact me at 916-448-2581 or via email at tim_shestek@americanchemistry.com

Sincerely,



Tim Shestek
Senior Director, State Affairs

