



**PUBLIC REQUEST TO ADDRESS
THE BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES, CALIFORNIA**

MEMBERS OF THE BOARD

HILDA L. SOLIS
HOLLY J. MITCHELL
LINDSEY P. HORVATH
JANICE HAHN
KATHRYN BARGER

Correspondence Received

			The following individuals submitted comments on agenda item:	
Agenda #	Relate To	Position	Name	Comments
14.		Favor	Corey Beavers	For far too long local jurisdictions and consumers have been tasked with the proper disposal of HHW. This comes to a great cost to both parties both financially and ecologically. Extended Producer Responsibility policies help protect jurisdictions, residents, and the environment. Please consider voting in favor of Item #14.
			Dawn Schultze-Allen	Please develop and pass EPR policy to help public agencies in managing costly and complex Household Hazardous Waste and Electronic Waste programs and restrict and/or ban the sale of products that contain hazardous materials that are currently not covered by state legislation. The companies that profit from the sale of these products containing hazardous materials should be held responsible for ensuring safe hazardous waste management for all of these products. Thank you
			George Bennett	<p>The motion by Supervisor Horvath to address Household Hazardous Waste (HHW) through Extended Producer Responsibility (EPR) is a critical step toward ensuring a safer, more sustainable future for Los Angeles County. HHW and E-Waste pose significant environmental and public health risks when improperly disposed of.</p> <p>Establishing an EPR program will not only provide a safe and convenient way for residents to dispose of these materials but will also hold producers accountable for the end-of-life management of their products.</p> <p>We applaud the County for exploring a comprehensive EPR policy and urge the Board of Supervisors to move forward with this motion. Such measures are vital in reducing toxic exposure, promoting producer responsibility, and safeguarding our communities from the dangers of illegal dumping and pollution.</p> <p>Thank you for taking this important step toward a healthier and more sustainable future for Los Angeles County.</p>
			Heidi Sanborn	The National Stewardship Action Council (NSAC) is a 501(c)(4) non-profit organization comprised of governments, non-government organizations, businesses, and consumers with the vision for the United States to attain a responsible, circular economy, an economic system aimed at designing out waste and pollution, keeping materials in use, and regenerating natural systems. NSAC strongly supports the proposed motion. HHW costs too much to manage, and the County should consider making the producers of products who profit from them, pay for their lifecycle costs as is done now for mercury thermostats and paint products. Please pass this motion and allow staff the ability to share the options on how to proceed. Thank you.



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Agenda #	Relate To	Position	Name	Comments
14.		Favor	Jennifer Faught	I work in local government at a solid waste authority in the bay area and wish to express my strong support for EPR for Household Hazardous Waste. Programs such as this can really help those of us in local government to properly handle some of the most difficult materials-ones that should never be part of the regular waste and recycling stream. I support EPR as an effective and fair tool for managing this issue. LA's leadership in this area can help establish the same type of program in our region. Thank you for your consideration of my comments.
			Joanne Brasch	CPSC is one of the top advocates in the state on EPR with many funders representing local government waste authorities who operate Household Hazardous Waste (HHW) Facilities. We appreciate the representation from LA County on our Board of Directors and leadership on with this ordinance. We strongly support the Regulation of HHW through EPR and recommend an aye vote. We believe this HHW EPR program will greatly benefit the residents and businesses in the County by: 1. Saving the County significant amounts of funding from operating HHW facilities; 2. Providing residents with safer and convenient collection of covered products; 3. Protecting vulnerable populations from exposure risks from hazardous chemicals; 4. Deploying education and outreach to increase awareness and program participation; 5. Providing transparent and accountable reporting with County oversight and enforcement.
			Sarah Erlich	Please see attachment.
			Tim Goncharoff	This is a logical next step for Los Angeles County. EPR programs for difficult waste products are widespread and very effective. It's time to move the burden from taxpayers to the companies that produce the waste. Please vote yes.
			Tony Hackett	EXTREMELY SUPPORTIVE. LA County must lead the way by instituting EPR for HHW

The following individuals submitted comments on agenda item:				
Agenda #	Relate To	Position	Name	Comments
14.		Other	Christopher Finarelli	<p>The Household & Commercial Products Association (HCPA) appreciates the opportunity to provide input on the proposed motion to evaluate the feasibility of implementing an Extended Producer Responsibility (EPR) program for the management of Household Hazardous Waste (HHW). Across the country, HCPA has worked closely with policymakers on issues related to product lifecycles, recycling, and proper disposal. HCPA is committed to collaborating with the county to identify effective strategies for improving HHW management.</p> <p>HCPA strongly recommends that the county revise the proposed motion to require Public Works and county staff to coordinate with organizations representing potentially impacted producers. Both EPR and HHW management involve significant complexities, and including these key stakeholders in the feasibility study process will help ensure the county gains a comprehensive understanding of the challenges and potential solutions.</p>
		Item Total	10	
Grand Total			10	



NATIONAL
STEWARDSHIP
ACTION COUNCIL™

ADVOCATING FOR A RESPONSIBLE, CIRCULAR ECONOMY

January 9, 2025

The Honorable Kathryn Barger, Chair
County of Los Angeles Board of Supervisors
Kenneth Hahn Hall of Administration
500 West Temple Street, Room 383
Los Angeles, CA 90012

RE: Regulation of Household Hazardous Waste through Extended Producer Responsibility - SUPPORT

Dear Supervisor Horvath,

The [National Stewardship Action Council](#) (NSAC) is a 501(c)(4) non-profit organization comprised of governments, non-government organizations, businesses, and consumers with the vision for the United States to attain a responsible, circular economy, an economic system aimed at designing out waste and pollution, keeping materials in use, and regenerating natural systems. NSAC strongly supports the proposed motion that would instruct the Director of Public Works, in coordination with the Chief Sustainability Officer, the Directors of Public Health, and Consumer and Business Affairs, and County Counsel, to report back to the Board in writing in 120 days on the feasibility of creating an ordinance that would establish an Extended Producer Responsibility (EPR) program for the safe, convenient, and sustainably-financed collection and take-back of Household Hazardous and Electronic Waste (HHW/E-Waste) not covered by State legislation.

HHW is a broad category of many common products used daily by consumers that contain hazardous materials, such as vape pens, batteries, paints, pesticides, pool cleaners, and more. HHW requires special handling and disposal and is illegal to dispose of in the trash or recycling, down storm drains, or onto the ground. When illegally or improperly disposed of, HHW can release toxic chemicals into the environment and contaminate our air, water, and food supply and expose sanitation workers which are now in the 4th most deadly profession in the U.S. according to the Bureau of Labor Statistics' 2023 National Census of Fatal Occupational Injuries revealed a concerning rise in the fatality rate for refuse and recyclable materials collectors. With 41 fatalities, the **occupation is now the 4th deadliest in the United States**, up from 7th in 2021 and 2022.

Providing convenient access to HHW collection can also help the success of other existing programs. For example, removing contamination of HHW from the trash or recycling will be critical to making packaging EPR laws successful and the collected material clean and available for food-grade applications.

EPR is a policy widely used in the world to manage HHW. In fact, most HHW products are under EPR programs in Canada. Everything from small appliances to spray paint and oil are covered products and the producers pay for their lifecycle management relieving local governments from the burden of managing the products. In California, Mercury thermostats were the first hazardous product placed into EPR program in 2008, and in 2010 it was then paint which was expanded this year to include all specialty paints thanks to Senator Allens SB 1143 passing. In 2018, L.A. County took bold steps towards EPR for medication and needles which ultimately led to the producers coming to the table in Sacramento to pass SB 212 by Senator Hanna-Beth Jackson from Santa Barbara. Now, CA. is the only state in the U.S. that has a statewide program paid by producers to pay for medicine and needle collection.

In 2023, [Vermont](#) became the first state to pass a law creating EPR for HHW, which requires the producers of covered HHW to fund and operate a convenient collection system to ensure proper management of HHW.

In CA. in 2021, NSAC's Director Heidi Sanborn Chaired the [California's Commission on Recycling Markets and Curbside Recycling](#), which was comprised of 17 experts representing materials management companies, with an LA County representative Coby Skye, unions, and NGOs, which unanimously recommended that the legislature establish EPR for HHW.

In 2024, California State Senator Ben Allen introduced the nation's second HHW EPR bill, [SB 1143](#), sponsored by NSAC as a comprehensive solution for HHW that would have moved California away from its existing product-by-product approach to producer responsibility. However, SB 1143 was ultimately narrowed to the PaintCare Expansion Act, which was signed into law in September 2024.

Senator Allen remains committed to this issue and will again be pursuing a statewide solution in 2025, local government action is needed as it was on medications and needles, to put pressure on the producers to "come to the table" with serious proposals to help us solve the HHW crisis. The cost of managing HHW is growing quickly, we need the producers to help. We strongly encourage L.A. County, and other counties, to take action to protect the health of workers, the public and the environment.

For these reasons, **NSAC strongly supports the proposed motion.** Thank you to Supervisor Horvath, for bringing forward this critical and timely issue.

Sincerely,



Jordan Wells, Director of Advocacy and Communications



January 13, 2025

RE: Support for Motion 25-0351: Regulation of Household Hazardous Waste Through Extended Producer Responsibility

Dear Supervisors:

The Center for Environmental Health (CEH) applauds Supervisor Horvath for introducing Motion 25-0351 (“the Motion”), and strongly encourages the Board of Supervisors to approve it. CEH, a non-profit organization based in Oakland with a nationwide reach, protects vulnerable communities from exposure to toxic chemicals in the air, water, soil, food, and consumer products. This motion aligns with our vision to promote healthy communities and remedy environmental injustice.

The Motion’s proposed requirements that: (1) the Department of Public Works, the Fire Department, the Chief Sustainability Office, the Department of Public Health, County Counsel, and the Department of Consumer and Business Affairs assess the feasibility of creating an ordinance establishing a comprehensive Extended Producer Responsibility (EPR) program that would cover the return of Household Hazardous and Electronic Waste

(“HHW/E-Waste”) excluded from state law; and (2) the Chief Executive Officer, Legislative and Intergovernmental Relations, with the assistance of Public Works, endorse state legislation to expand the state’s existing EPR policy on HHW/E-Waste are critical efforts to streamline the proper disposal of HHW/E-Waste. An ordinance enacted pursuant to this Motion would safeguard human health, particularly among vulnerable communities and sanitation workers, and it would provide significant cost savings for the County.

This motion, if leading to a report back that recommends establishing such a HHW/E-Waste program, could potentially address the critical gaps in federal and state law regarding proper HHW/E-Waste disposal. The state EPR program is limited to paint and related finishes, and excludes items the California Department of Toxic Substances Control identifies as household hazardous waste, including antifreeze, batteries, drain cleaners, electronic wastes (including televisions, computer monitors, cell phones), glue and other adhesives; household cleaners, oven cleaners, pesticides, pool cleaners, solvents, used oil, waste that contains asbestos; and wastes that contain mercury, such as thermometers and fluorescent lights.¹

Although Los Angeles County’s current HHW/E-Waste Program is comprehensive, allowing consumers to drop off HHW/E-Waste for proper waste disposal at permanent and temporary locations throughout the County,² consumers face a dizzying maze to determine which products are classifiable as HHW/E-Waste, and where to locate the proper County disposal location. The producers of HHW/E-Waste need to streamline the process of HHW/E-Waste disposal, which could lead to higher HHW/E-Waste disposal rates, lower environmental hazard exposure for workers and vulnerable communities, and product reformulation to reduce toxic loads in such products. Additionally, the cost of HHW/E-Waste disposal has outpaced the funding available to finance it. CEH strongly believes that the companies that produce and profit from the products that become HHW/E-Waste should pay for the proper management and disposal of these wastes.

Depending on the substance, household hazardous waste can be irritating to the respiratory system, corrosive to the skin, explosive, flammable, or carcinogenic.³ As of 2022, HHW/E-Waste comprised “less than [two] percent of the disposed waste stream” in the County.⁴ That relatively low number is deceptive, however, since the consequences of

¹ Department of Toxic Substances Control, *Managing Household Hazardous Waste, Household Hazardous Waste* (Oct. 31, 2024) < <https://dtsc.ca.gov/household-hazardous-waste/> > [as of Jan. 12, 2025], hereafter “DTSC, *Managing Household Hazardous Waste*.”

² Los Angeles County, *Los Angeles County Zero Waste Plan, Appendix B: Existing Waste Diversion Efforts*, p. 71, <<https://zerowaste.lacounty.gov/wp-content/uploads/sites/2/2022/08/ZWP-Final-Draft-August16-2022-WEB-1.pdf>> [as of Jan. 13, 2025], hereafter “Los Angeles County, *Zero Waste Plan*.”

³ DTSC, *Managing Household Hazardous Waste*.

⁴ Los Angeles County, *Zero Waste Plan*, p. 35.

improper hazardous waste disposal are severe, including impacts to our water and air quality, and potentially our food supply.⁵ Without a robust EPR in place, the modes of improper hazardous waste disposal are too accessible to L.A. County residents, who may opt to place HHW in a bin with their regular trash, pour products in the sink, into storm sewers, or on the ground.⁶ Additionally, when poured into toilets or down sink drains, septic tanks and wastewater treatment systems can become contaminated.⁷

As the motion text aptly notes, the improper disposal of hazardous waste imperils the safety of sanitation workers who come into contact with it. The California Division of Occupational Safety and Health classifies the waste collection and waste treatment and disposal industries as high hazard industries.⁸ Nationwide, low-income communities and communities of color are disproportionately exposed to hazardous waste. A study suggests that those facilities are deliberately placed in these communities due to racist motivations and a belief that sited communities “may lack political clout and resources needed to effectively oppose new facility proposals.”⁹

This Motion could protect a sector of the workforce that is especially vulnerable to injuries and low-income communities and communities of color from environmental hazard exposure, encourage producers of such products to create safer products, and lead to significant cost savings for the County. While the state Legislature may later expand the scope of its EPR program beyond disposal of paint and related finishes, the lives of too many Angelenos are at stake to wait to take action. Our health is already jeopardized by the additional pollution the recent firestorms are generating. CEH strongly urges the Board to pass the above-referenced motion.

Respectfully,

Sarah Erlich, Esq.
Policy Advisor, Center for Environmental Health
Sarahe@ceh.org

⁵ *Ibid.*

⁶ United States Environmental Protection Agency, *Household Hazardous Waste (HHW)*, (Feb. 23, 2024), < <https://www.epa.gov/hw/household-hazardous-waste-hhw> > [as of Jan. 13, 2025].

⁷ *Ibid.*

⁸ State of California, Department of Industrial Relations, Cal/OSHA, High Hazard Unit, *FFY 2024-2025 High Hazard Industries*, p. 2, <<https://www.dir.ca.gov/dosh/documents/hhu-list-2024-2025.pdf>> [as of Jan. 13, 2025].

⁹ Mohai and Saha, Which Came First, People or Pollution? Assessing the Disparate Siting and Post-Siting Demographic Change Hypotheses of Environmental Justice, *Environmental Research Letters*, 10 1 15008 (2015), pp. 1, 10, <<https://iopscience.iop.org/article/10.1088/1748-9326/10/1/115008/pdf>> [as of Jan. 13, 2025].

January 14, 2025

County of Los Angeles Board of Supervisors
500 West Temple Street, Room 381B
Los Angeles, CA 90012

Submitted via Public Comment Form

RE: CPSC Support on Proposed Regulation of HHW through Extended Producer Responsibility

Dear County of Los Angeles Board of Supervisors,

[The California Product Stewardship Council \(CPSC\)](#) is a nonprofit organization dedicated to reducing waste and advancing a circular economy in California. We advocate for Extended Producer Responsibility (EPR), a policy approach that holds manufacturers accountable for managing the environmental impacts of their products throughout their lifecycle. We aim to reduce waste, improve recycling, and shift the financial burden of disposal away from taxpayers and local governments. EPR promotes sustainable product design, combats pollution, and fosters innovation, creating a more equitable and resilient waste management system. Through collaboration and advocacy, CPSC is committed to protecting public health and the environment. CPSC is one of the top advocates in the state on EPR with many funders representing local government waste authorities who operate Household Hazardous Waste (HHW) Facilities. We appreciate the representation from LA County on our Board of Directors.

We strongly support the Regulation of HHW through EPR and recommend an aye vote.

We believe this HHW EPR program will greatly benefit the residents and businesses in the County by:

1. Saving the County significant amounts of **funding** from operating HHW facilities;
2. Providing residents with safer and **convenient collection** of covered products;
3. Protecting vulnerable populations from **exposure risks** from hazardous chemicals;
4. Deploying **education and outreach** to increase awareness and program participation;
5. Providing transparent and accountable **reporting** with County oversight and enforcement.

CPSC is available to share detailed data on the impacts of HHW in support of EPR as the best policy option. Our staff are in Los Angeles often and willing to present and testify in support of these regulations.

We respectfully request an aye vote to protect residents/businesses and save money for the County.

Thanks,



Joanne Brasch
Director of Advocacy