June 30, 2021

Mr. Clark Williams
Branch Chief
CalRecycle
1001 I Street
Sacramento, CA 95814

RE: Reuse Study – CARE Action Plan

Dear Clark:

Carpet America Recovery Effort (CARE) engaged the services of Abbe & Associates LLC to perform a Reuse Study to determine the barriers and opportunities for expanding the reuse of post-consumer carpet in California. The Reuse Study was submitted to CalRecycle on June 30, 2021, under separate cover. This document provides a brief Action Plan that CARE aims to implement for the remainder of 2021 and early 2022 and is intended to help prioritize the findings and recommendations of the Reuse Study. It is not intended to be exhaustive and may change as time and respective tasks progress. Please note that this Action Plan is for the immediate term (2021 and early 2022); the Reuse Study and CARE’s overall scope with regards to reuse are much broader than this Action Plan, and we will continue working to increase reuse well beyond this time frame to reach our stated goals and objectives. We do anticipate the recent adjustment to the tile subsidy ($0.20/lb. added) will have a material impact on growth in this category, consistent with the waste hierarchy.

Based on the Reuse Study, namely the Findings, Potential Role of CARE to Increase Reuse, and Next Steps sections, the following 10 items have been prioritized for CARE action. The top 3 actions that CARE anticipates will have the most beneficial and immediate impact are delineated below. The remaining 7 actions will also be implemented. Note: some of the text below has been taken directly from the Reuse Study.

TOP 3 ACTIONS CARE INTENDS TO IMPLEMENT

1. **Continue to provide expanded incentive payments to Collectors/Sorters to prioritize reuse.**
2. **Work to expand the infrastructure and marketing support for existing reuse outlets.** CARE to expand upon the successful marketing and promotion pilot conducted with Habitat for Humanity ReStore in Northern California to other current reuse outlets selling used carpet tile.

3. **Work to expand the number of reuse outlets that can handle post-consumer carpet.** CARE to build upon the successful used carpet tile sales achievement realized by a Habitat for Humanity ReStore location in Northern California. As most locations are independently operated, the expansion approach will be conducted in conjunction with the local CARE Collector/Sorter.

**ADDITIONAL ACTIONS CARE INTENDS TO IMPLEMENT**

4. **Expand current outreach and education efforts (focused on awareness and opportunities for carpet recycling) to include awareness and opportunities for carpet reuse.**
   CARE will inform retailers and installers of the best practices for preparing post-consumer carpet for reuse. CARE will continue to update and evolve the reuse landing page on our website. With input from Collector/Sorters, separate reuse collateral will be developed and/or reuse language will be added to existing collateral.

5. **Explore the role of, and research existing, reuse brokers who can match buyers to sellers (or donors to recipients).**

6. **Conduct outreach to large generators of post-consumer carpet, including building owners and managers, commercial contractors, and venues.**
   CARE will begin developing suggested contract language and work with venues, if and where possible, to help maximize the potential for carpet reuse. The Reuse Study has helped identify focus areas to target within certain stakeholder groups. For example, focusing on Exhibitor Appointed Contractors within the Convention Center umbrella is anticipated to present the best opportunities for increasing reuse with regards to temporary events and event spaces.

7. **Draft model contract language for smaller Convention Center venues to require that their haulers direct carpet to reuse and recycling options, as is done at some Convention Centers.**
   Convention Centers will be targeted in areas that have reuse and recycling options available. CARE will also continue to expand recycling and reuse options in underserved areas.

8. **Attempt to capture reuse metrics where reuse is already occurring.**
   CARE to assist in implementing tracking systems, if and where possible, to track post-consumer carpet reuse that is already occurring. For example, some Habitat for Humanity stores regularly sell used carpet tiles.
9. Provide outreach and education to commercial contractors and installers about the proper procedures for deinstalling carpet and carpet tile for reuse.

10. Explore ways to support existing deconstruction contractors in expanding their outlets for reuse.

Increasing the reuse of post-consumer carpet has proved to be a challenging task. CARE is optimistic that implementing these actions will help work to build a more robust infrastructure and support system for reuse. While it is difficult, and in some cases impossible, to quantify the projected amount of carpet that will result from these actions, CARE will track and report to CalRecycle the results to the best of our ability.

Sincerely,

Robert Peoples, Ph.D.
Executive Director, CARE

cc: Sustainable Planning Committee (SPC)
CA Carpet Stewardship Advisory Committee
Jacy Bolden, California Program Director