

DTSC (Green Chemistry Initiative)
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Attention: V. Lang

Date: 11/15/07

Re: Green Chemistry Initiative Public Comments

Fossil-fuel-based plastic use in our society continues to grow at an exponential rate, creating a plethora of environmental impacts for California, the oceans and, increasingly places like Lianjiao, China (see http://news.sky.com/skynews/video/videoplayer/0,,31200-greenbritain_china_p222,00.html).

The State of California has one of the most impressive recycling mandates in the country but I am very concerned about where our recycling, especially our plastic, is going.

Most consumers believe that their fossil-based plastic, once placed on the curbside for recycling has been taken care of in a way that renders any potential problems with plastic waste solved.

Myself and my colleagues at Green Sangha have been working over the past 2.5 years educating the public regarding plastic waste issues including pollution in the ocean.

The central Pacific Gyre contains a plastic waste mass that has been measured to be larger than the state of Texas. Because plastic does not biodegrade, plastic entering the oceans remain there unless it is deposited on a distant beach. Fossil fuel-based plastic has entered the marine food web at many trophic levels impacting countless marine species (birds, salps, marine mammals, etc...please see: http://www.algalita.org/pelagic_plastic_mov.html)

Small bits of plastic in the central Pacific Gyre outweighs zooplankton at a ratio of 6:1 (six pound of plastic for every pound of plankton!), according to research published by the Algalita Marine Foundation.

Of greatest concern for my organization and me right now is what is happening to our plastic waste once it leaves the US shores not as litter but as commerce.

At the link, http://news.sky.com/skynews/video/videoplayer/0,,31200-greenbritain_china_p222,00.html please find some news footage shot by Sky News in the UK. This news story highlights the situation that Californians don't

know about and never see. It is the story of the dark side of plastic downcycling that all policy makers need to see, we believe.

This short news piece is of great importance regarding plastic policy here in California. The plastic industry continues to repeat the mantra that plastic is fine; we must continue to use it but we need to do a better job recycling.

I'd like the Green Chemistry Initiative to first acknowledge that fossil plastic is downcyclable *not* recyclable. And that most of our fossil plastic waste is being shipped overseas and being handled under conditions that are harming water, air, public health and the land surrounding so-called recycling facilities.

In the video workers are exposed to mountains of unsanitary plastic waste. They melt it down and/or burn it; smoke and ash fills the air. Untreated polluted water runs into local streams turning them dark grey; they too are littered with plastic and ash. Workers are subjected to toxic fumes and heavy metals where PVC is downcycled without any idea that their work is dangerous.... Needless to say, there are no health or environmental standards in places such as Lianjiao, China.

Our continued embrace of plastic needs to be looked at with a cradle-to-cradle perspective, which requires a close look at what is happening overseas.

The Green Chemistry Initiative is for California, but for the initiative to have integrity in cannot be part of exporting waste that is causing great harm overseas. We in California need to develop closed-loop safe and just ways of handling our waste. The current model of exporting plastic to countries such as China needs to be stopped if California is serious about its Green Chemistry Initiative.

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PS For additional footage from China "recycling" plants, please contact me; I have acquired a longer video of the footage from the link described above:

http://news.sky.com/skynews/video/videoplayer/0,,31200-greenbritain_china_p222,00.html

PPS Below please find a link to the short online version of the video described above and some articles regarding waste exports to China. Please be aware that despite the fact that these stories are from England, even larger amounts of

fossil-based plastic are being exported from the US to China and other third-world countries.

Below is a link to the Sky News report regarding plastic dumping to Lianjiao, China and three related articles from January 2007.

Online Sky TV news video of plastic "recycling" in China:
http://news.sky.com/skynews/video/videoplayer/0,,31200-greenbritain_china_p222,00.html

Authorities blamed for swelling toxic wastes

http://www.chinadaily.com.cn/china/2007-01/15/content_784053.htm

(Xinhua)
Updated: 2007-01-15 20:59

BEIJING -- Chinese Internet users are calling for government action to shut the door to foreign toxic wastes, after television reports revealed how customs and environment authorities were failing to stop imports of hazardous garbage.

Related readings:

- ◆ [Songhua set for clean-up](#)
- ◆ [Toxic apparel discovered at Wal-Mart, other retailers](#)
- ◆ [Chain stores probed for selling toxic clothes](#)
- ◆ [Cote d'Ivoire charges 18 people for toxic waste dumping](#)
- ◆ [Smell of progress can be hazardous](#)
- ◆ [Prozac plus Ecstasy a toxic combo](#)
- ◆ [Ivory Coast names new govt after toxic waste scandal](#)

A netizen named Fruitful Autumn said the public was infuriated by the fact toxic wastes were allowed into their country.

Other online commentators said the authorities should effectively enforce the laws against imports of toxic wastes, insisting that China should not become a victim of imported hazardous materials.

A report by China Central Television (CCTV) came after Britain's Sky News aired a programme titled "Are you poisoning China?", revealing how plastic wastes produced by British households ended up in Lianjiao, a small town near Guangzhou, capital of south China's Guangdong province.

The footage showed Chinese workers amid mountainous piles of plastic shopping bags and choking on toxic smoke from burnt plastics. It also pictured nearby rivers blackened by chemical wastes from incineration.

"The bags should have been classified before being imported, but they were not. Some are non-degradable and contain hazardous substances," said Yang Sujuan, deputy director of the Research Institute on Environmental Law in China University of Political Science and Law.

Yang said importing hazardous wastes was a blatant violation of the national law on environment protection, and the local customs had apparently failed to curb the profitable trade in smuggled waste.

"A lot of waste is dumped and burned at open air sites, when it should have been delivered to qualified processing factories and supervised by local environment authorities," said Yang.

"The incineration will produce dioxins, highly-toxic and carcinogenic substances that will harm not only the workers, but also local people," said Mao Da, a member of Global Village of China, a Beijing-based non-government-organization as saying, in the CCTV programme.

Mao said both importers and exporters had violated the Basel Convention on the Transboundary Movement of Hazardous Wastes and Their Disposal, to which China is a signatory.

He said local environment authorities should order immediate proper disposal of the imported waste.

The report sparked protests and calls for official action from many Internet users, who said they were infuriated by the fact that Maersk Lines shipped China-made Christmas presents to Europe, but toxic wastes back to China.

Developing nations have been destinations of potentially deadly materials from rich countries, which export waste to save the costs of recycling and landfills.

China alone has taken thousands of tons of transboundary hazardous wastes, including waste liquid from the Republic of Korea, used plastic bags from Germany and used batteries from the Netherlands, according to the report.

A lot of the waste usually ended up rotting in rubbish tips, releasing lead, cadmium, mercury and other deadly compounds, said Wu Aiping, an expert with the State Environmental Protection Administration in an earlier report.

Watchdog to crack down on foreign waste imports

www.chinaview.cn 2007-01-31 23:49:51

GUANGZHOU, Jan. 31 (Xinhua) -- An environment official in south China's Guangdong Province vowed Wednesday to crack down on illegal imports of dangerous garbage, which has seriously polluted a village in the province.

"The illegally-operated businesses that processed waste plastic near the village of Lianjiao have been ordered to move, and the remaining waste plastic has been cleared away," said Chen Guangrong, deputy director of the Guangdong Provincial Environmental Protection Bureau.

The local government had earlier banned unlicensed businesses and individuals from importing plastic waste into Lianjiao, located in an industrial zone in Nanhai District of Foshan City. It has been a processing center for plastic waste since the 1970s.

Britain's Sky News TV recently screened a program titled "Are you poisoning China?", revealing how Britain's plastic waste was ending up in Lianjiao.

The footage showed Chinese workers, on top of mountainous piles of plastic shopping bags, choking on toxic smoke from burnt plastics. It also pictured nearby rivers blackened by chemical wastes from incinerators.

Picking up on overseas reports, China's media have pointed out that while China exports 8 million tons of commodities to the United Kingdom each year, the UK sends back 1.9 million tons of waste.

"All the imported waste in the industrial zone were most probably coming from smuggling or other illegal channels, because none of the businesses in the zone which process imported waste plastic have received government approval," Chen said, without explaining how almost two million tons of waste could be smuggled into the country.

"We will not go soft in the crackdown on illegal imports of foreign waste," he said.

Investigators found that Lianjiao receives up to 200,000 tons of plastic waste every year, 80 percent of which was collected from domestic sources and the rest was suspected of being imported from overseas, Chen said.

Chinese law on the control of solid wastes explicitly bans imports of solid wastes that cannot be recycled without causing harm. Importers of solid waste which can be recycled must be registered.

The State Environmental Protection Administration (SEPA) has said it is closely watching the progress of the British investigation into its exports and has been negotiating with European Union agencies on the prevention and crackdown of illegal international shipments of harmful waste.

It is also working with other government departments to improve regulations and standards regarding waste imports, enhance supervision in processing waste and in the fight to prevent waste smuggling, the SEPA said.

<http://news.independent.co.uk/environment/article2186532.ece>

The slow boats to China filled with our refuse

By Cahal Milmo

Published: 26 January 2007

When the world's largest container ship docked in Britain shortly before Christmas, its vast cargo of goods, from bingo sets to bras, epitomised the scale of imports from China. But when the MS Emma Maersk, dubbed "SS Santa", set sail on its return journey to Yantian, few noticed it was laden with Britain's fastest-growing export to China: waste.

A combination of the global economy and the boom in recycling in Britain, which last year generated nearly 7 million tonnes of recyclable waste, has created an inter-continental trade worth £460m. Last year, Britain sent more than 200,000 tonnes of plastic to China for recycling, along with 2 million tonnes of used paper or cardboard and large quantities of steel and redundant electrical goods.

It is a market generated by Britain's lack of capacity to cope with its own recycled waste and, more importantly, the thirst of China for "raw" materials, such as used plastic, to feed its booming economy.

The Environment Agency authorises a small number of exporters to send abroad "green" waste - recyclable products sorted into different categories. It insists the trade is "robustly regulated".

Such is the demand from the Far East, a trawl of plastic exchange websites yesterday revealed dozens of China-based companies willing to pay £300 for every tonne of bottles made from PET, the plastic used for water or soft drinks. In Britain, plastic recyclers can barely pay £100 per tonne.

At about £500 to send a 26-tonne container of waste to China, it is now cheaper to send plastic to the Far East than by road from London to Manchester.

Some experts argue that the trade in fact creates a virtuous circle. A consultant for one of the leading exporters said: "It sounds perverse but if you think about it we are using waste that would otherwise go to landfill, filling ships that would otherwise be empty, and creating business that would otherwise use virgin raw materials."

But the waste trade is not always virtuous. The Environment Agency has prosecuted several companies for attempting to export "green" paper waste mixed with normal municipal rubbish.

And the human and environmental cost to those who then pick through the waste is unknown, despite the insistence of the authorities that no harmful waste is permitted to enter the country.

Critics say sending the material across the planet is "barmy". A spokesman for Friends of the Earth said: "We would prefer to see this material recycled in Britain by expanding our own recycling industry."