



# MBA Polymers, Inc.

February 15, 2011

Comments to:

***Assembly Committee on Environmental Safety and Toxic Materials***

Chairman Bob Wieckowski

And

***Assembly Committee on Health***

Chairman William Monning

## **On the Implementation of the California Green Chemistry Initiative**

I just learned while listening to the hearing online today that the comment period ends today so I am rushing to get a very brief, but I think important, comment from the perspective of MBA Polymers, a California headquartered company that is now the world leader at recycling plastics from end-of-life computers, appliances, electronics and automobiles. I will be testifying on February 28 at the EPR (Extended Producer Responsibility) hearings in Sacramento. I testified before the US Congress about 16 months ago on a similar topic.

As a show of third party verification, we have won many international environmental and innovation awards for our leadership in this area:

- The 2010 ***Economist*** Innovation Award for Energy and the Environment
- World Economic Forum Tech Pioneer
- Tech Museum Tech Laureate Award – Intel Environment Award
- Thomas Alva Edison Award for Innovation
- The Ascent Award for Entrepreneurship
- Earth-Keeper Hero, [www.myhero.com](http://www.myhero.com)
- California Governor's Environmental and Economic Award

Here are my brief comments:

We fully support the intention behind Green Chemistry. And I support it at a professional and person level. For one thing, I have two young kids, a 10 year old daughter and a 5 year old boy. My family very much enjoys living in California for many reasons, including the beauty of the California environment.

As a world-leading recycler, we want to make sure that the good intentions of this initiative don't KILL RECYCLING. Recyclers have to deal with small amounts of many different legacy chemicals/additives in the materials they recover from end of life electronics, appliances, computers and automobiles.

In the case of plastics, for example, there are measurable, but small amounts of many materials of concern in some of the plastics, such as some heavy metal pigments and stabilizers and brominated flame retardant additives. We sort out the plastics containing these legacy additives from the plastics that don't – but no separation process is perfect, so small amounts of plastics containing these legacy additives remain in our products.

**However, we meet many very strict environmental regulations and standards such as RoHS, REACH, EPEAT and UL.** And we are invited to work directly with the organizations and legislators developing these regulations and standards.

These standards and regulations recognize that there is “no such thing as zero” in the world of recycling and they have put in very low, but non-zero, limits to substances of concern.

Our company wants to make sure that the Green Chemistry regulations also recognize the enormous benefits from recycling – as I will talk about on February 28 and as I did for the US Congress in 2009 (see attached). I hear a great deal about bad chemicals and it sounds like they will be “banded” in California. We simply want to make sure that these good initiatives don't kill recycling by setting “zero” standards for substances of concern. As Voltaire famously said: “The perfect is the enemy of the good”.

There is an enormous amount of good from the work we do around the world at “closing the loop” with the largest manufacturers in the world. We regularly work with the leading electronics and IT companies, many here in the Bay Area, to adopt Cradle to Cradle concepts and reusing these valuable materials again.

Setting regulations to zero for legacy substances will kill recycling and all of the benefits recycling can bring. We'd be happy to share with the Green Chemistry team what these many other agencies have concluded with respect to creating low, non-zero limits so we significantly reduce risk, while realizing the huge energy, environmental and economic benefits provided by reusing old materials.

Please let me know how I can best communicate this to the organization(s) accepting public comments on AB 1879 and SB 509.

Respectfully yours,



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