



July 3, 2023

The Honorable Luz M. Rivas  
Chair, Assembly Natural Resources Committee  
Legislative Office Building  
1020 N Street, Room 164  
Sacramento, CA 95814

**RE: Senate Bill 707 (Newman): Responsible Textile Recovery Act of 2023.**

Dear Assemblymember Rivas:

On behalf of the following organizations, we are writing to respectfully request that the Responsible Textile Recovery Act (SB 707) be made a two-year bill.

We are keenly interested in policies that will help progress the textile, apparel, and footwear industry's sustainability and circularity goals. Well designed extended producer responsibility (EPR) schemes can play a crucial role in directing investment towards reuse, repair, and recycling infrastructure, and bolstering their respective markets, all while incentivizing the prioritization of product stewardship when designing and manufacturing new products.

As a first of its kind bill in the United States, SB 707 is positioned to influence all future textile EPR legislation in this country. It is critical that this legislation accomplishes what it sets out to achieve and, as representatives of organizations and businesses the bill intends to support, we have a vested interest in its success. Additional time would also afford all stakeholders the ability to learn from both California's own pilot textiles EPR program passed last year, as well as ongoing efforts in the European Union to stand up a textiles EPR program.

We have significant concerns and questions about how and whether the scope and mechanics of SB 707 can truly support circularity efforts. Group and individual concerns have been expressed, however they have not yet been incorporated into SB 707. Some of major issues we would like to see addressed include:

- How reuse and recycling infrastructure and markets will be better supported, from both a consumer and business perspective
- Where the products and materials will be resold for reuse and recycling, and how market demand and infrastructure will be built and supported
- How the PRO system will allow existing businesses, for profit and non-profit alike, to participate while aggregating materials sufficiently
- Clarity on guidelines with regards to product safety, sorting and material handling
- Clarity around brand and retailer responsibility and liability

- Leveraging data to create a needs assessment based on completed pilots to inform success at scale
- How businesses that ship directly to California consumers from but do not have operations in the state will participate

We worry that the current draft of the proposal will create more problems than it will solve. We understand that there are further amendments forthcoming, but at this point, there is not enough time left in the legislative calendar to meaningfully address all the concerns we have either collectively or individually raised. Additional time will afford all stakeholders the ability to work through difficult issues and sincerely collaborate on crafting an effective program.

This request is not without precedent. The Plastic Pollution Prevention and Packaging Producer Responsibility Act (SB 54) took four years to negotiate, and the infrastructure for plastic waste collection, sorting, and recycling is considerably more developed than similar infrastructure for textiles. We do not wish for negotiations to take as long as they did for SB 54 but would ask for similar opportunities as stakeholders to have robust and frank discussions about this proposal.

We again request that SB 707 be made a two-year bill and look forward to working with the legislature this fall and into 2024 on crafting a textiles EPR program that works in California.

Respectfully,

Chelsea Murtha  
Director of Sustainability  
American Apparel & Footwear Association (AAFA)

Rachel Kibbe  
Founder and Executive Director  
American Circular Textiles (ACT)

Karla Magruder  
Founder and President  
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