



For its part, the State Water Resources Control Board (State Water Board) estimates annual costs of \$250,000 for three years for one limited-term position to participate in the working group, study and evaluate different methods of methane reduction, and assist with compiling findings and recommendations (Waste Discharge Permit Fund). While the State Water Board is not explicitly referenced in the bill, the board expects to be involved in implementation because of its role in regulating landfills (see below for more information).

## COMMENTS:

### 1) **Purpose.** According to the author:

To ensure California is keeping up with emerging technologies in our efforts to address climate emissions, the experts at CalRecycle should be reviewing projects around the world to see if their work could help us reach our climate goals. In a recent visit to Oslo, I was able to see first hand the Northern Lights project and was curious if this type of technology could help us meet our climate goals. As landfills like Chiquita Canyon continue to burn unchecked, the status quo seems unsustainable and an examination of possible alternative options should be pursued.

### 2) **Background. *Laws on the Books.*** SB 54, the Plastic Pollution Prevention and Packaging Producer Responsibility Act, imposes, among other things, minimum content requirements for single-use packaging and single-use plastic food service ware, to be achieved through an extended producer responsibility program. SB 54 requires producers, through a producer responsibility organization, to pay \$500 million per year for ten years (from 2027 to 2037), into the California Plastic Pollution Mitigation Fund, which the bill established to fund various environmental and public health programs.

SB 1383 requires the Air Resources Board (ARB) to approve and implement a comprehensive short-lived climate pollutant (SLCP) strategy to achieve, by 2030, the following reductions from 2013 levels: a 40% reduction in methane, a 40% reduction in hydrofluorocarbon gases, and a 50% reduction in anthropogenic black carbon. Methane is a powerful SLCP that is 84 times more potent than carbon dioxide over a 20-year timescale.

***Carbon Capture.*** According to ARB, the 2022 Scoping Plan Update shows there is no path to carbon neutrality without carbon removal and sequestration. Carbon dioxide removal (CDR) and sequestration can take different forms. CDR refers to both mechanical and nature-based removal of carbon from the ambient air. Nature-based carbon removal can take the form of carbon sequestration in growing trees or other landscapes. Mechanical carbon removal refers to direct air capture with sequestration or bioenergy paired with carbon capture and sequestration. Separately, carbon capture and storage refers to carbon capture and sequestration from a facility.

***Carbon Capture from Waste Disposal.*** The author notes that a handful of nations in the European Union have begun implementing carbon capture projects to help them meet their greenhouse gas emission reduction targets. The author points to the Northern Lights project in Oslo, Norway, which recently conducted its first carbon capture injection into a reservoir in the North Sea using a cement factory and a waste-to-energy project as the sources of carbon dioxide for the project. The author argues it is important to study waste disposal and

carbon capture strategies in other nations, particularly as California struggles with landfill fires and other challenges related to waste diversion and reduction.

***State Water Board's Role.*** The State Water Board's Land Disposal Program implements statewide regulations for sites and facilities where waste is discharged to land. It enforces requirements for siting, operation, and closure of waste disposal sites through the issuance of waste discharge requirements and compliance and enforcement efforts to ensure adequate protection of water quality.

***Opposition.*** A coalition of organizations oppose the bill unless it is amended and argue that including incineration as part of CalRecycle's assessment raises significant environmental and public health concerns. The coalition argues that incineration facilities "have a long and well-documented history of disproportionately impacting low-income communities and communities of color through localized air pollution," including the release of toxic co-pollutants. The organizations request that the bill, among other things, be amended to limit the scope of any required assessment to non-disposal technologies.

**Analysis Prepared by:** Nikita Koraddi / APPR. / (916) 319-2081