

July 10, 2024

The Honorable Assemblymember Buffy Wicks
Chair, Appropriations Committee
1021 O Street, Suite 8220
Sacramento, CA 95814

RE: SB 707 (Newman) Responsible Textile Recovery Act of 2024 - CONCERN

Dear Assemblymember Wicks,

Commercial laundry processors promote a circular economy by renting, maintaining, and re-processing environmentally sustainable reusable goods. As there can be confusion on the term sale, SB 707 should be amended to include the definition of sale as outlined in CA Rev & Tax Code § 6006 to ensure commercial laundry processors engaged in rental operations will not be required to participate in a Producer Responsibility Organization (PRO).

Textiles Rental Services Association (TRSA) serves companies that supply, launder and maintain linens and uniforms. TRSA builds a stronger, safer and more environmentally sustainable community through advocacy, education, certification, research, benchmarking and information-sharing.

Commercial laundry processors are environmental stewards that use highly efficient, water- and energy-saving technology to maintain, process and recycle reusable textiles. Life Cycle Analyses (LCAs), which aggregate the environmental impacts throughout a product's lifespan, find that across various product categories, reusable textiles are significantly more environmentally sustainable than their single-use counterparts.¹ For example, a study on healthcare gowns found that compared to disposables, reusables reduce solid waste generation by 93%, blue water consumption by 41%, greenhouse gas emissions by 30%, and energy consumption by 28%. A single reusable gown can replace 75-100 single-use gowns.² An LCA on clean room coveralls found similar benefits of reusables, including a 94-96% reduction in solid waste to the landfill, 59% lower process energy, 56% lower natural resource energy, 57% lower greenhouse gas emissions, and 77% lower blue water consumption.³

Once the rented textiles reach the end of their useful life cycle, the items then get repurposed for other uses such as industrial wipers and insulation.

Commercial laundry processors own and maintain their inventories. They rent the reusable goods to customers including healthcare facilities, hotels, restaurants, retailers, and government entities (e.g., first responders, public utilities, infrastructure maintenance operations). As commercial laundries provide goods on a rental basis, they are not producers and thus should not be required to participate in a PRO.

¹ National Academies of Sciences, Engineering, and Medicine. 2024. *Reusable Health Care Textiles for Use in Personal Protective Equipment: Proceedings of a Workshop*. Washington, DC: The National Academies Press. <https://doi.org/10.17226/27762>.

² Vozzola, E., Overcash, M., & Griffing, E. 2018. *Environmental considerations in the selection of isolation gowns: A life cycle assessment of reusable and disposable alternatives*. American journal of infection control, 46(8), 881–886. <https://doi.org/10.1016/j.ajic.2018.02.002>

³ Vozzola, E., Overcash, M., & Griffing, E. 2018. *Life Cycle Assessment of Reusable and Disposable Cleanroom Coveralls*. PDA journal of pharmaceutical science and technology, 72(3), 236–248. <https://doi.org/10.5731/pdajpst.2017.007864>

SB 707 aims to prevent and reduce solid waste in landfills. This goal aligns with the commercial laundry business model and role in supporting a circular supply chain. Please amend SB 707 to include the definition of sale as outlined in CA Rev & Tax Code § 6006.

For questions, please contact me at kschwalb@trsa.org or 703-519-0029.

Sincerely,

Kevin D. Schwalb

Kevin D. Schwalb

CC: Members of the Assembly Appropriations Committee
Nikita Koraddi, Consultant, Assembly Appropriations Committee
Author, Senator Josh Newman