



Carbon Cycle Institute



January 20, 2026

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

**RE: AB 643 (Wilson) – Biosolids Fertilizer Eligibility for SB 1383 Procurement – OPPOSE UNLESS AMENDED**

Dear Chair Wicks,

The undersigned organizations must respectfully oppose AB 643 unless it is amended to ensure alignment with the purpose of the SB 1383 procurement system. We appreciate the work of the author's office on AB 643, which seeks to support innovative approaches to organic waste diversion. We additionally appreciate amendments accepted in Assembly Natural Resources which address some of our concerns. However, as currently written, this bill still risks undermining the procurement markets that SB 1383 was expressly designed to support.

We appreciate the author's intent to provide local governments with additional tools to meet SB 1383's procurement requirements. Organic materials like food scraps, yard

trimmings, paper, and cardboard make up over half of what Californians send to landfills, contributing roughly 20% of the state's methane emissions. In response, SB 1383 (Lara, 2016) established statewide organic waste reduction targets—50% by 2020 and 75% by 2025—and required local jurisdictions to procure recycled organic waste products to help drive market demand, support infrastructure development, and achieve California's climate goals. The program has already generated \$2.3 billion in private investment, with an estimated \$17 billion in long-term economic benefit and thousands of green jobs created. That success depends on clear, climate-aligned rules.

It is our understanding that the bill aims to include an end product made from food scraps and biosolids within SB 1383 procurement eligibility. This end product is a liquid, biosolids-derived fertilizer, licensed by CDFA for agricultural use. CAW supports efforts to expand compliant procurement pathways for jurisdictions. However, the bill's current language still presents a remaining concern that, if unaddressed, risk undermining SB 1383's effectiveness.

**Procurement credit must be limited to historically landfilled materials.** To uphold SB 1383's intent, procurement credit should be reserved for products derived from organic waste streams that were *historically* landfilled (like food scraps and yard waste). Biosolids, by contrast, have been diverted through wastewater treatment systems for decades and are often composted or land-applied across the state. The procurement program was designed to create markets for newly-diverted SB 1383 materials— a distinction that is reflected in the existing procurement regulations.

Allowing the biosolids portion of co-processed materials to count towards procurement would expand SB 1383 procurement well beyond its intended scope and create precedent for wastewater residuals (materials that are already diverted through means with established infrastructure and end markets). As written, the bill risks weakening the procurement system and shifting demand away from compost markets that SB 1383 has built and is still actively building across the state.

To ensure procurement credit reflects the intent of the procurement program, only the food portion of co-processed food and biosolids end products should count towards procurement. Biosolids-derived portions must remain ineligible.

**Aside from our remaining concern outlined above, we believe that this issue is best addressed through the regulatory process.** The bill's goals would be more appropriately

addressed through CalRecycle's regulatory authority, particularly under the "other pathways" provision created by AB 2346 (Lee, 2024). That provision allows CalRecycle to:

- Develop conversion factors for compost or other materials applied locally;
- Explore additional pathways to prioritize local use of compost and related products.

A regulatory approach allows for careful vetting, public input, and science-based policy development that balances innovation with climate integrity.

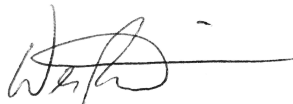
We appreciate the author's intent to support local governments in implementing SB 1383 and to explore additional, compliant procurement pathways. It is critical, however, that any expansion of procurement eligibility maintain the high standards necessary to ensure SB 1383 delivers the methane reductions and organic waste recycling outcomes it was designed to achieve.

We appreciate the author's office's continued collaboration and engagement in resolving the concerns outlined above and ensuring AB 643 supports flexibility without compromising SB 1383's environmental goals. However, we must respectfully urge a no vote on the bill at this time.

Sincerely,



Erica Parker,  
Policy Associate  
**Californians Against Waste**



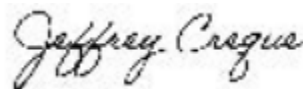
Wes Reutimann,  
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**Active San Gabriel Valley**



Anna Larson,  
Associate Policy Director  
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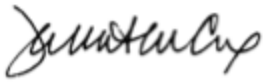
Vanessa Forsythe RN MSN,  
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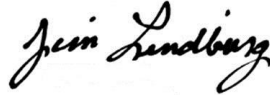
Jeffrey Creque,  
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**Carbon Cycle Institute**



Andria Ventura, Legislative  
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**Clean Water Action**



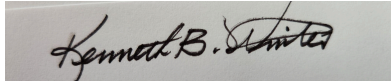
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CC:

The Honorable Assemblymember Lori Wilson  
Assembly Appropriations Committee  
Assembly Appropriations Committee, Members