



February 5, 2021

The Honorable Marc Levine  
California State Assembly  
State Capitol, Room 5135  
Sacramento, CA 95814

**RE: AB 318 (Levine) Hazardous waste: classification: exclusions: green waste.  
NOTICE OF SUPPORT**

Dear Assemblymember Levine,

The California Cannabis Industry Association (CCIA) is proud to support your Assembly Bill 318, which seeks to exempt green waste, including cannabis waste, from being classified as hazardous, allowing cannabis operators to promote greater sustainability in the supply chain.

The California Department of Toxic Substances Control (DTSC) conducts a number of tests in order to determine if certain types of waste are considered hazardous to the environment, including the acute aquatic toxicity test. Otherwise known as the “fish test”, the process involves placing some waste in a water tank and introducing a fish species into the tank; if the fish cannot survive, the waste is classified as hazardous. Obviously, green waste is one such waste category that does not pass the fish test, and must technically be classified as “hazardous”. This category of green waste includes cannabis waste, as well.

As a result of this classification, compost facilities are unable to accept green waste from farmers and growers, including cannabis cultivators. This not only leads to increased operational costs for cultivators who need to manage hazardous waste, but discourages sustainability in the growing process.

This bill seeks to exempt green waste from being classified as hazardous so long as it has not been contaminated by a chemical that the department determines is hazardous or toxic during the production, harvest, or processing stage. By allowing for this reasonable exemption, green waste can be responsibly composted and the cannabis industry, and California agriculture as a whole, can make strides toward more sustainable and eco-friendly practices.

For these reasons, CCIA is proud to support AB 318 and thanks you for your leadership on this important issue.

Sincerely,

Lindsay Robinson  
Executive Director