



October 15, 2018

The Honorable Ahsha Safai
The Honorable Malia Cohen, Chair, Budget and Finance Committee
San Francisco Board of Supervisors
San Francisco City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102

Dear Supervisor Safai:

I am writing to express Biocom's concern regarding the proposed Refuse Separation Compliance legislation (File #180646). Biocom echoes the San Francisco Chamber of Commerce's request for the legislation to be continued, so that stakeholders can find common ground on the details of the proposed regulations with you and the Department of the Environment.

Biocom is the largest, most experienced leader and advocate for California's life science sector. We work on behalf of over 1,100 members to drive public policy, build a network of industry leaders, create access to capital, introduce cutting-edge STEM education programs, and create value-driven purchasing programs. Biocom represents over 100 industry members and those who provide affiliated services in the City of San Francisco.

Biocom understands the need for new legislation to assist the city in reaching its Zero Waste Goals. Our concern is that the proposed legislation is too broad to be applied across industries whose operations are diverse and unrelated to one another. The life science industry is required to comply with various existing waste regulations in addition to basic hauling practices, including those related to waste separation, disposal of hazardous materials, and recycling of lab consumables.

Our sector is a leading industry in recycling and proper waste disposal because nearly all life science facilities have Cal EPA ID numbers, which make them responsible for tracking any potential hazardous waste "cradle to grave." To track and dispose of these materials, our facilities implement programs including:

- Red bags for biomedical waste
- Secure containers for sharps disposal
- Separation and consolidation of flammables

Our facilities also include services related to the disposal of hazardous materials in contracts with their waste haulers. Because our waste programs are extensive, most life science facilities employ a full time Environmental Health and Safety professional (usually degreed in environmental science and certified in hazardous materials management) whose primary function is to oversee waste programs and ensure regulatory compliance.





All of these activities naturally lead to increased compliance with waste management throughout the life science industry. As such, the industry should be seen as an example to emulate rather than a target for additional regulation.

We appreciate the opportunity to be involved in conversations related to waste management moving forward, and would welcome your questions and concerns. Please feel free to contact Melanie Cohn, Director of Regional Policy and Government Affairs, at mcohn@biocom.org or 858-832-4158.

Sincerely,

Joe Panetta
President & CEO
Biocom

CC: Clerk of the Board of Supervisors, to be distributed to all Supervisors; Mayor London Breed; Department of the Environment Director Deborah Raphael

