



**American  
Packaging**  
CORPORATION

100 APC Way • Columbus, WI 53925

[www.AmericanPackaging.com](http://www.AmericanPackaging.com)

April 8, 2021

Oregon State Senate  
Committee on Energy and Environment  
900 Court Street, NE  
Salem, OR 97301  
(Submitted Electronically)

To Whom it May Concern:

American Packaging Corporation (APC) is submitting its opposition to Senate Bill 582-1, which would establish extended producer responsibility program (EPR) for packaging.

APC is a family-owned flexible packaging converter and renowned leader in the North American packaging industry. APC specializes in flexographic and rotogravure printing, multi-ply extrusion, and adhesive lamination of film, paper and foil, as well as pouch and bag fabrication to meet a variety of requirements. APC operates five Centers of Excellence with locations in Churchville NY, Rochester NY, Columbus WI, DeForest WI, and Story City, IA.

APC is committed to a circular economy for flexible packaging – designing the right package for the product and utilizing less water and energy to do so; emitting less greenhouse gases in the manufacture and transportation of the package; using the least amount of packaging, plastic or multi-materials, necessary for the protection of the product; and creating less waste in the first place®. We are also working on solutions for more robust collection, processing and recycling of flexible products as well as sustainable end markets.

While APC appreciates the many amendments, the sponsor has made to the bill to make a more workable solution from the original bill, we continue to oppose it as it still gives far too broad authority to the Department of Environmental Quality and Environmental Quality Commission to dictate the terms of the program instead of the Producer Responsible Organization. In addition, the bill is still too focused on current municipal government recycling programs and reimbursement for the status quo, instead of investment in infrastructure to ensure that all packaging is collected and recycled. The complexity of the bill is also still staggering; and for the first of its kind program in the U.S. cannot be a model for a true EPR system for packaging. Thus, APC opposes SB582-1

APC is a member of the Flexible Packaging Association (FPA) and supports its testimony on this bill, including FPA's recommendation for amending the legislation to comport with its Circularity for Flexible Packaging elements detailed with the Product Stewardship Institute at <https://www.flexpack.org/end-of-packaging-life>.

In advance, thank you for your consideration. If we can provide further information or answer any questions, please do not hesitate to contact me or Alison Keane, President & CEO, FPA, at [akeane@flexpack.org](mailto:akeane@flexpack.org) or 410-694-0800.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Koch". The signature is fluid and cursive, with the first name "Jeff" and last name "Koch" clearly distinguishable.

Jeff Koch  
President