

April 8, 2021

Chair Lee Beyer
Vice Chair Lynn Findley
Senate Committee on Energy and Environment
Oregon State Legislature
900 Court St. NE
Salem, OR 97301
Submitted via email

Re: CTA Comments on Senate Bill 581-1 - Neutral

Dear Chair Beyer, Vice-Chair Findley and Members of the Committee:

The Consumer Technology Association™ (CTA)¹ respectfully submits these comments regarding [Senate Bill 581-1 \(SB581-1\)](#) which was recently amended to establish a Truth in Labeling Task Force to evaluate misleading or confusing claims regarding the recyclability of products made on a product or product packaging. CTA is appreciative of the recognition that the prior version of the bill was not a viable path forward and the creation of a Task Force is a crucial first step in addressing concerns around claims of recyclability for products and product packaging.

CTA remains neutral on the establishment of the Task Force but has several suggestions on clarification to the current language:

- **Producer Membership:** The current language for the member slots intended to be filled by producers is confusing on entities eligible to participate. It also appears focused solely on a producer's interest as it relates to packaging. Given that the Task Force is also focused on claims about products, CTA suggests the following revision:
 - Section 1(2)(c)(A). Five members to represent producers of packaged items and brand users of printing, paper and food service ware products and producers of products contained in packaging. Representation shall include different product types as well as different packaging material types.

¹CTA is the trade association representing the U.S. consumer technology industry. Our members are the world's leading innovators – from startups to global brands – helping to support more than 18 million American jobs. CTA's members have long been recognized for their commitment and leadership in innovation and sustainability, often taking measures to exceed regulatory requirements on environmental design, energy efficiency, and product and packaging stewardship.

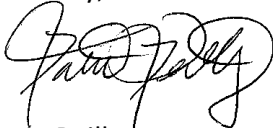
CTA wants to ensure that there is fair representation among the various packaging material types (e.g., plastic, paper, etc.) for producers of products contained in packaging. CTA would also be open to the creation of separate, additional member slots for producers of products given labeling of products is specific to individual product types (e.g. consumer technology products versus food) while labeling of packaging may be applicable across industry sectors.

- **Evaluation of Legal Requirements:** CTA recommends the inclusion of additional language requiring the Task Force to evaluate legal requirements that producers may be subject to in other jurisdictions. CTA outlined several of these requirements in prior written testimony on SB581 and SB582-1. CTA suggests the following addition:
 - Section 1(3). The task force shall study and evaluate misleading or confusing claims regarding the recyclability of products made on a product or product packaging. The study must include consideration of issues affecting accessibility for diverse audiences as well as the legal requirements in other jurisdictions for labeling of products and product packaging.

Conclusion: CTA appreciates the opportunity to provide comments on SB581-1 and asks the Senate Committee on Energy and Environment to consider incorporation of the above suggested language. We appreciate the Committee's goal of reducing consumer confusion and see the creation of the Task Force as an important first step toward that goal.

Please do not hesitate to contact me with any questions or requests for additional information.

Sincerely,



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cc: Senator Michael Dembrow
Senator Art Robinson
Senator Kathleen Taylor