



April 8, 2021

Lee Beyer, Chair  
Senate Committee on Energy and the Environment  
900 Court St. NE, S-411  
Salem, Oregon 97301

*Submitted Electronically*

**RE: SB 581 and SB 582-1 OPPOSE**

Chair Beyer and Members of the Committee:

Consumer Brands Association (Consumer Brands)<sup>1</sup> champions the industry whose products Americans depend on every day. From household and personal care products to food and beverage products, the consumer packaged goods (CPG) industry plays a vital role in powering the U.S. economy, contributing \$2 trillion to U.S. GDP and supporting more than 20 million American jobs. Consumer Brands advocates for uniform regulatory frameworks established from risk-based science that promote choice and build consumer trust across the sectors we represent. Consumer Brands appreciates the opportunity to provide comments on Senate Bills 581, and 582-1 (EPR / Labeling Bills).

Currently, the labeling mandates in SB 581 create an Oregon only set of labels, could significantly disrupt supply chains, and dramatically increase costs for re-labeling. Tremendous effort has been made to keep products on the shelf during the current pandemic and we strongly discourage introducing additional complexities such as an Oregon only label at this time. However, our initial reading of the “dash one” amendments would be a fair interim step. By creating a task force we believe stakeholders could have a meaningful conversation about the how to best help Oregonians and product manufacturers can work together to reduce contamination.

SB 582, as currently written, unnecessarily infuses excessive costs and singularly focuses the entire economic burden on CPG companies and other producers without the benefit of cost control measures or a true shared responsibility model. For

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<sup>1</sup> Formerly the Grocery Manufacturers Association.



instance, SB 582-1 estimates the costs to exceed \$100 million annually. While Consumer Brands members support a shared responsibility model, what is proposed is anything but that.

We understand there are 582-9 amendments and they were publicly shared less than 24-hours before the public hearing. In total, the new proposal is more than 100 pages and there has not been sufficient time to review the proposal, assess the costs, and evaluate the amendments practical impacts. Therefore, it is hard to provide meaningful feedback at this time. However, the Consumer Brands Association does support the ongoing efforts of coalition partners and our self described “producer amendments.” While the “producer amendments” don’t have complete consensus we believe they move the conversation forward in many of the substantive areas needed to enhance Oregon’s recycling system and create a sustainable solution.

Although we are opposed to the current forms of the EPR / Labeling Bills, Consumer Brands and the CPG industry is committed to packaging design solutions, identifying system improvements, and participating in shared responsibility financing to help achieve Oregon’s recycling and waste goals. We look forward to further working with you and sharing our specific ideas on this important issue.

Sincerely,

John Hewitt  
Senior Director, State Government Affairs