



February 23, 2021

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

Submitted Electronically

RE: SB 14, SB 581, and SB 582-1 OPPOSE

Chair Beyer and Members of the Committee:

Consumer Brands Association (Consumer Brands)¹ 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 14, 581, and 582-1 (EPR / Labeling Bills).

The protection of the environment is a priority shared by the CPG industry and we are united in our efforts to raise recycling rates, reduce waste to landfill and keep packaging out of the environment, especially our oceans and waterways. Consumer Brands was generally supportive of the idea behind the Recycling Steering Committee (“RSC”). However, we believe the focus on evaluating Oregon’s recycling system would have been a worthy step in addition to the focus on modernize the recycling system. As such, the costs associated with implementing the EPR Bills have become disproportionately high 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 instance, SB 582-1 estimates the costs to exceed \$100

¹ Formerly the Grocery Manufacturers Association.



million annually. While Consumer Brands members support a shared responsibility model, what is proposed is anything but that.

In addition to our concerns over the costs to implement the EPR bills, we have significant reservation with the labeling mandates in SB 581. Creating an Oregon only set of labels creates significant supply chain disruptions and significantly increases 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. We believe continuing to invest in consumer education will yield better results both in reducing confusion but also maintaining a resilient supply chain.

The Consumer Brands Association and the CPG sector has been actively developing and implementing solutions to help improve recycling and recyclability of their products. In fact, all of the 25-largest CPG companies have made commitments to improve their packaging, including making packaging fully recyclable or compostable, using new materials, or increasing recycled content. The packaging materials of today and tomorrow need a recycling system that can accept and process those materials and return them to the supply chain to be used again as feedstock or to create value-added materials with recycled content.

Although we are opposed to 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