

February 13, 2023

Senator Janeen Sollman
Senate Committee on Energy and Environment
900 Court St. NE
HR B
Salem, Oregon

Re: Minnesota HF 1000/SF 834 “Protecting Against Forever Chemicals Act”

Dear Chair Sollman and Members of the Committee,

The Consumer Technology Association™ (CTA) respectfully submits this letter to voice our opposition to SB544, establishing a regulatory scheme for source reduction of single use plastic packaging. CTA is North America’s largest technology trade association. Our members are the world’s leading innovators – from startups to global brands – helping support more than 18 million American jobs. Our member companies have long been recognized for their commitment and leadership in innovation and sustainability, often taking measures to exceed regulatory requirements on environmental design and product stewardship. We respect the overall intent of this bill to reduce the amount of packaging in the waste stream, but offer the following comments that support our opposition.

Impractical Source Reduction Goals

CTA does not support legislatively mandated rates for packaging source reduction that are not connected by data. CTA approaches the packaging conversation from the unique perspective that accompanies complex durable goods. Packaging design flexibility for producers to achieve desired environmental outcomes – including the reduction of damage to products during transport which is critical for the consumer technology industry - should be encouraged. Consumer technology products have unique protection needs – screen protection, protection against shock and vibration for sensitive components – that dictate and severely limit the packaging material types and amount that adequately protect these products. Legislatively mandated source reduction rates are not informed by an assessment that studies the relationship between the package and the product itself and can result in the increased amount of product breakage – which would contribute to the waste stream, instead of reducing it.

Oregon recently passed SB582 “Plastic Pollution and Recycling Modernization Act” which already accomplishes the intention of this bill, to reduce the overall solid waste from packaging. CTA supports the processed outlined in SB582, as opposed to mandated rates. This includes the eco-modulation of fees, where manufacturers pay a higher price in order to use materials that are less favorable to the recycling system and have a higher environmental impact. Processes that incentivize manufacturers to

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make material selections that are more environmentally friendly is not only better for the recycling system but it also does not stifle innovation by holding manufacturers to impossible standards.

Additionally, while we agree that the transition to refillable or removable packaging can be an important component to increased resilience in our recycling and solid waste management systems, we do not agree that these requirements can be applied to the electronic industry. The durable goods industry is a small contributor to the overall packaging waste and CTA would support packaging reduction strategies specifically tailored to our industry, not arbitrary goals mandated in statute that will hinder innovation.

Conclusion

CTA appreciates the opportunity to provide written testimony on SB544 and we welcome further discussion with the Committee. We approach these conversations from the durable goods industry, a different perspective than those of fast-moving consumer goods and appreciate the Committee's considerations of our unique experience. Please do not hesitate to contact me with any questions or requests for additional information.

Sincerely,

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

Ally Peck
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