

March 28, 2023

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

Re: SB 123-2 Relating to Recyclability Claims

Dear Chair Sollman and Members of the Committee,

The Consumer Technology Association™ (CTA) appreciated the opportunity to offer comments on Senate Bill (SB) 123, which focuses on electronic labeling of products. CTA supports the intent behind the bill of reducing consumer confusion. With the inclusion of additional amendments, we are currently neutral on the legislation, but offer the following comments as well as recommend a task force be convened to further examine the issue.

CTA 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.

Oregon's Plastic Pollution and Recycling Modernization Act

Oregon recently passed SB582 "Plastic Pollution and Recycling Modernization Act" (RMA) already takes action at accomplishing the intent of this bill, to reduce consumer confusion on recyclability. Under the RMA, one statewide list of recyclable materials is currently under development. This uniform collection list will allow individuals and businesses to recycle the same items across the state, at home and at work. One list also provides clarity to households and businesses about what can be recycled and creates efficiencies in recycling operations across the state.

The RMA also has a strong focus on educating consumers about how and what to recycle. The producer responsibility organizations (PRO) will create accessible educational resources that local governments can use and that meet the needs of the diverse communities within the state. CTA believes that standardized recycling in tandem with the educational component prescribed by the RMA may eliminate the need for additional product labeling.

When approaching the labeling discussion, it is important to remember that our member companies produce goods for the North American market including standardized packaging for the continent. CTA

CTA Comments on Senate Bill 343
March 28, 2023

would not support any future legislation that would be in conflict with other jurisdictions within this region. On the contrary, we advocate for increased harmonization of requirements wherever possible. It is impractical and difficult for our industry to comply with regulations that are specific to any one state. Any future requirements that include electronic labeling will need to be part of a coordinated national approach to support manufactures' overall compliance.

Conclusion: CTA appreciates the opportunity to provide comments on SB123. We agree with the intent to reduce consumer confusion on recycling and welcome further discussions on smart labeling technologies with the Committee and other stakeholders.

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 the last name "Peck" clearly distinguishable.

Ally Peck
Senior Manager, Environmental and Sustainability Policy
apec@cta.tech
(703) 395-4177