



american cleaning institute®

Wednesday, February 26, 2025

Chairman Floyd Prozanski
Committee on Judiciary
Oregon State Senate

Re: Testimony from the American Cleaning Institute on SB 680 – OPPOSED

Thank you for the opportunity to provide testimony on SB 680 which is being heard before your committee. The American Cleaning Institute (ACI) – the national trade association representing the \$60 billion cleaning product industry – and its members are keenly focused on providing consumers with the most effective and environmentally responsible cleaning products possible. We also strive to provide consumers with evidence that our products are safe and have been made with respect for people and the environment. One of our key goals is to be a more transparent industry, strengthen trust, provide ingredient communication, and help purchasers choose cleaning products with confidence.

Unfortunately, the language in SB 680 is overly broad and not prescriptive enough to be fairly and consistently enforced. Terms such as “false”, “substantiated”, and “environmental marketing claim” are overly broad and leave too much ambiguity to achieve the intent of the legislation. *ORS 646.607* already regulates unlawful business and trade practices, including marketing claims. SB 680 looks to expand this law to encompass all claims relating to environmental impacts of products – something that would set an inappropriate standard for states and could result in inconsistent regulations not just in regional markets but across the country. Any effort to identify and define the full scope of green marketing claims should be made at the federal level. This would ensure that there is consistency across the states for claims on packaging, as many of our members do not ultimately have control over where their products are distributed to and sold and therefore would create impossible regulatory hurdles for many consumer goods companies if a patchwork is created.

In 2012, the Federal Trade Commission (FTC) released a revised set of *Green Guides*¹ which are designed to help marketers avoid making environmental claims that mislead consumers and are currently being revised again and should be published in the near future. These Guides have established a de facto national standard for ecolabeling requirements for specific terms to ensure the validity and accuracy of our claims. They, however, are not all encompassing of the terms used to describe our products’ relationship with the environment, which is why many of our members use their websites to describe the details pertaining to the claims they make.

ACI’s members are committed to adhering to the FTC’s *Green Guides* when it comes to product labeling which is why we provided comments to the FTC during their open comment period. We are anticipating a newly updated set of standards in the near future.

¹ <https://www.ftc.gov/news-events/topics/truth-advertising/green-guides>

SB 680 is duplicative of what already exists across the country, is overly broad in nature, and would create a poor precedent that could lead to a non-uniform patchwork of policy across the country. ACI is strongly **opposed** to SB 680 and recommends you **do not pass** this bill.

Sincerely,

A handwritten signature in black ink, appearing to read "Brennan Georgianni". The signature is fluid and cursive, with the first name being more prominent.

Brennan Georgianni
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