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MEMORANDUM

TO: Chair Vega Pederson and Vice-Chairs Johnson & Reardon

CC: Committee Members, House Committee on Energy and Environment
Oregon House of Representatives

FROM: Jacob Cassady
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American Cleaning Institute®

DATE: May 14, 2015

SUBJECT: **OPPOSE** H.B. 3251 “Product Stewardship for Household Hazardous Waste”
Legislation

The American Cleaning Institute (ACI®), is the trade association representing the \$30 billion U.S. cleaning products market. Our members include the formulators of soaps, detergents, and general cleaning products used in household, commercial, industrial and institutional settings; companies that supply ingredients and finished packaging for these products; and oleochemical producers. ACI and its members are dedicated to improving health and the quality of life through sustainable cleaning products and practices. ACI’s mission is to support the sustainability of the cleaning products industry through research, education, outreach and science-based advocacy. Since 1926, ACI has promoted health through personal hygiene and effective cleaning. More information can be found at www.cleaninginstitute.org

ACI appreciates the opportunity to provide comment on H.B. 3251. We believe that a cost effective system of shared responsibility for end-of-life product/package management currently exists which includes all factors in the commercial chain including producers, consumers and government. This system has evolved, and continues to evolve, with shared costs and responsibilities between the parties. Among other factors, it efficiently accommodates variations in population density, transportation costs and local resources.

“Framework” Approach is Perilous

ACI must respectfully oppose H.B. 3251. The bill embodies the so-called framework approach whereby Commissions and Committee – not a legislative body – determine a list of products that require its producer to be responsible for the end-of-life disposition via a stewardship organization established by a manufacturer.

The language in the bill is written broadly enough that household cleaning products could be considered for inclusion under any proposed household hazardous waste (HHW) product stewardship program. The potential inclusion of household cleaning products is unnecessary because the vast majority of cleaning products are water soluble and are formulated for safe disposal in either municipal or home wastewater treatment systems. Any inclusion of household cleaning products, in such a program would place an additional burden and expense on communities and individuals. Cleaning products do not typically contain ingredients that would harm the environment in the quantities that are disposed of by households.

All Costs Are Borne by Consumer

Communities spend a lot of resources when disposing of HHW and the inclusion of water-soluble household cleaning products, creates extra burdens for local governments and consumers.

Additionally, the fee structure requirements for covered products in the proposed stewardship programs will place further costs for manufactures. As costs rise for producers, they will rise for consumers who, in the end, will see the price of their cleaning products increase. Whether costs are internalized in the local tax bill or in product cost, the consumer always pays in the end.

Conclusion

The cleaning products industry has demonstrated its commitment to manufacturing sustainably while maintaining its social commitment to providing consumers of all economic levels with cost efficient cleaning products leading to improved hygiene. Any program that adds unnecessary costs must be scrutinized from that perspective as well.

Thank you for your attention and consideration of these comments. We urge the Committee to consider ACI's critique of H.B. 3251 against the decades long commitment our members have had to sustainability. For future reference, my contact information is (202) 662-2514 (direct dial) or via electronic mail at jcassady@cleaninginstitute.org.

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