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Oregon State Senate
Committee on Energy and Environment
900 Court Street, NE
Salem, OR 97301
(Submitted Electronically)

To Whom it May Concern:

Sun Chemical is submitting its opposition to Senate Bill's 582-1, which would establish extended producer responsibility program (EPR) for packaging.

Sun Chemical is a recognized leader in printing inks, coatings and supplies for the packaging, publication, commercial, industrial, and digital markets and introduces solutions that enable marketers to better manage their brand colors, protect product integrity through improvements in packaging, and introduce security features that defend against counterfeiting.

Sun Chemical is committed to a circular economy for flexible packaging – designing the right package for the product and utilizing less water and energy to do so; emitting less greenhouse gases in the manufacture and transportation of the package; using the least amount of packaging, plastic or multi-materials, necessary for the protection of the product; and creating less waste in the first place®. We are also working on solutions for more robust collection, processing and recycling of flexible products as well as sustainable end markets.

While Sun Chemical appreciates the many amendments, the sponsor has made to the bill to make a more workable solution from the original bill, we continue to oppose it as it still gives far too broad authority to the Department of Environmental Quality and Environmental Quality Commission to dictate the terms of the program instead of the Producer Responsible Organization. In addition, the bill is still too focused on current municipal government recycling programs and reimbursement for the status quo, instead of investment in infrastructure to ensure that all packaging is collected and recycled. The complexity of the bill is also still staggering; and for the first of its kind program in the U.S. cannot be a model for a true EPR system for packaging. Thus, Sun Chemical opposes SB582-1.

Thus, Sun Chemical urges the Committee to not vote in favor of the bill. Sun Chemical is a member of the Flexible Packaging Association (FPA) and supports its testimony on this bill, including FPA's recommendation for amending the legislation to comport with its Circularity for Flexible Packaging elements detailed with the Product Stewardship Institute at <https://www.flexpack.org/end-of-packaging-life> and work towards a real EPR system for packaging in the state.

In advance, thank you for your consideration. If we can provide further information or answer any questions, please do not hesitate to contact me or Alison Keane, President & CEO, FPA, at akeane@flexpack.org or 410-694-0800.

Sincerely,

Chris Parrilli
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