



Plastic Packaging Technologies, LLC

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April 8, 2021

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

To Whom it May Concern:

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

Plastic Packaging Technologies, LLC (PPT) is a leading manufacturer of flexible packaging materials – including rollstock and stand-up pouches and bags – primarily for food, pet food, medical and healthcare and consumer specialty markets. PPT has manufacturing facilities in Kansas City, KS and Columbus, OH from which it serves customers, including brand owners, consumer packaged goods companies and private label throughout North America.

PPT 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 PPT 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, PPT opposes SB582-1.

Thus, PPT urges the Committee to not vote in favor of the bill. PPT 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.

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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,

David Staker
CEO & President
Plastic Packaging Technologies, LLC

Cc: David B. Potter, PPT
Alison Keane, FPA