

Tuesday, January 14, 2023

Chairwoman Janeen Sollman Committee on Energy and Environment Oregon State Senate

## Re: Testimony from the American Cleaning Institute on SB 544 – OPPOSED

Thank you for the opportunity to provide testimony on SB 544 which is being heard before your committee. The American Cleaning Institute (ACI) – the association for detergent and cleaning product manufacturers – has a vested interest in ensuring packaging such as that which is encompassed by this legislative proposal does not become waste. That is why we have a goal to eliminate all cleaning product packaging waste by 2040 and are already making great strides in creating more recyclable packaging, reducing our packaging usage and incorporating more recycled content into the packaging we do introduce to market.

While we support the effort to minimize packaging use – as exemplified by our industry's goals and achievements thus far – we cannot support this legislation due to its stringency and duplicity. Our concerns with this legislation are:

- our industry is already investing in reuse and refill technologies, and overcoming limitations;
- the method of source reduction does not take into account the environmental impacts of switching to other materials;
- this supersedes efforts already underway to optimize packaging use in the state as intended by the Plastic Pollution and Recycling Modernization Act;
- the goals and timelines are not supported by relevant data; and
- ignores the authority and insight vested in the producer responsibility organization that will be established, along with the Oregon Recycling System Advisory Council.

We would like to reiterate that ACI members support efforts to reduce packaging waste. We hope the Legislature will take more time to contemplate ACI input on this bill. ACI looks forward to providing necessary input regarding the performance of our products and packaging to achieve desired policy goals.

Sincerely,

Brennan Georgianni

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