



VIA EMAIL

2/11/2026

**Subject: Testimony on HB 4030 – Recycling Modernization Act Fix
Chair Gamba and Members of the House Committee on Climate, Energy, and
Environment,**

Thank you for the opportunity to submit written testimony on HB 4030, the *Recycling Modernization Act Fix*. Armstrong World Industries, Inc. (“AWI”) is a leading designer and manufacturer of innovative interior and exterior architectural solutions across the Americas, including ceilings, specialty walls, and exterior metal systems. For more than 160 years, Armstrong has supported architects, designers, and contractors with products that elevate aesthetics, acoustics, and sustainability. While some products are available through retail outlets, the vast majority of our sales are business-to-business (“B2B”), serving distributors, contractors, and builders.

AWI respectfully urges the legislature to exclude packaging associated with building products sold B2B—including packaging for ceiling and wall systems—from HB 4030, the Recycling Modernization Act Fix.

Packaging Is Essential to Product Integrity and Performance

Packaging for ceiling and wall products is not optional or cosmetic. These materials are engineered to protect products from moisture, dirt, compression, and physical damage from our manufacturing facilities through transport, storage, and installation on the jobsite. Packaging safeguards the structural and performance characteristics of our products, ensuring safety and code-compliance once installed.

AWI continuously works to minimize packaging while maintaining the protection required for safe delivery and performance. Importantly, the embodied environmental impacts of our products significantly outweigh those associated with their packaging, making damage prevention—not packaging reduction—the most sustainable pathway.

Increased Packaging Fees Will Elevate Construction Costs

Any packaging-related fees applied to building products will directly increase manufacturing and operational costs. These increases will flow to builders and, ultimately, to homeowners, renters, and commercial occupants. The cumulative effect of applying EPR fees to building materials will raise the cost of new construction and renovations, exacerbating affordability challenges already facing Oregon.

Building Product Packaging Differs Fundamentally from Consumer Packaging

Extended Producer Responsibility (EPR) programs are traditionally structured around consumer packaging waste streams. In contrast, packaging used for building materials follows commercial and industrial handling practices, with distinct logistics, recovery pathways, and waste management systems. Applying consumer-focused EPR rules to B2B construction packaging would misalign policy intent with real-world material flows.

Recommended Exclusion

For these reasons, AWI respectfully requests that Oregon's EPR framework explicitly exclude packaging associated with B2B building materials, including packaging used to protect ceiling and wall products during transport, storage, and installation.

AWI remains committed to sustainability, material efficiency, and responsible manufacturing. In both 2025 and 2026, Armstrong was recognized by Newsweek as one of America's Greenest Companies, reflecting our longstanding environmental leadership. We look forward to collaborating with policymakers on solutions that advance Oregon's environmental goals without compromising affordability, safety, or the performance of essential building materials.

Sincerely,

A handwritten signature in black ink that reads "Amy A. Costello". The signature is written in a cursive, flowing style.

Amy A. Costello, P.E., LEED AP
Product Stewardship and Sustainability Manager
Armstrong World Industries, Inc.