

**Testimony in Support of Excluding Building Product Packaging
from Extended Producer Responsibility (“EPR”) Programs
as an Amendment to HB 4030 Recycling Modernization Act Fix**

The North American Insulation Manufacturers Association (“NAIMA”) is the trade association for North American manufacturers of fiber glass, rock wool, and slag wool insulation products. NAIMA’s member companies manufacture fiber glass and mineral wool insulation products that support building energy efficiency and decarbonization. Fiber glass and mineral wool are the primary thermal and acoustic insulation materials used in residential new construction and home retrofits. Mineral wool insulation is also used in applications requiring enhanced fire protection. While insulation is sold through retail outlets, a majority of sales are business-to-business (“B2B”) – directly to distributors, contractors, and builders.

NAIMA respectfully urges the legislature to exclude packaging associated with building products sold B2B, including insulation packaging, as an amendment to HB 4030 Recycling Modernization Act Fix.

Packaging Is Essential to Product Integrity and Performance

Insulation packaging is not discretionary or cosmetic. Fiber glass and mineral wool insulation must be protected from moisture, contamination, and physical damage from the manufacturing facility through transportation, storage, and installation on the jobsite. The plastic packaging used for insulation plays a critical role in preserving the product’s performance, allows for proper compression to maintain transportation efficiencies, and provides installation instructions until installation is complete.

Increased Packaging Costs Directly Impact Housing Affordability

Applying a packaging tax to building products will increase costs for manufacturers. These costs will be passed directly to builders and ultimately to homeowners, renters, and commercial building occupants. The aggregate cost of these fees on building materials and products will almost certainly increase the cost of new housing and further contribute to Oregon’s affordability challenges.

Building Product Packaging Is Fundamentally Different from Consumer Packaging

EPR programs are typically designed to address consumer packaging waste streams. Building materials packaging operates in a commercial and industrial context with different handling and recovery pathways. Business-to-business packaging fundamentally differs from consumer-facing packaging in both design and end-of-life management. B2B packaging is typically handled within controlled commercial and industrial settings, collected directly from businesses, and recycled through established channels outside of the municipal waste system. As a result, this material has a significantly higher recyclability rate than consumer packaging and does not meaningfully contribute to litter or landfill waste.

Recommended Exclusion

For these reasons, NAIMA requests that Oregon's EPR regulatory reach explicitly exclude packaging associated with building materials sold business-to-business, including plastic packaging used to protect fiber glass and mineral wool insulation during transport, storage, and installation.

NAIMA and its member companies remain committed to sustainability, material efficiency, and responsible manufacturing. We look forward to working with policymakers on solutions that advance environmental goals without undermining affordability, safety, or the performance of critical building materials.

NAIMA has worked closely with Oregon Business & Industry (OBI) in sharing the impacts that EPR legislation has on our business. Thank you for your consideration.

Abbey Patterson

Director of Sustainability
NAIMA
678-640-2500
apatterson@NAIMA.com