

June 28, 2021

The Honorable Kate Brown
900 Court Street, Suite 254
Salem, OR 97301
(Submitted Electronically)

RE: SB 582, Modernizing Oregon's Recycling System

Dear Governor Brown:

The Flexible Packaging Association (FPA) is writing to urge you to veto SB 582, since despite its title, the bill will actually increase taxes on Oregon's citizens and not improve municipal recycling systems in the state. FPA 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.

FPA believes extended producer responsibility (EPR) can be an important component to these solutions. Unfortunately, SB 582 is merely a tax under the guise of EPR. SB 582 would give the Department of Environmental Quality and an advisory committee, the authority, through rulemaking, to assess fees on producers for packaging, while dictating not only the amount of the fees, but where and how the fees should be distributed to reimburse current municipal solid waste programs. This is not EPR. SB 582 focuses on the current system and does not address what is really needed, which is a future to ensure that all packaging is collected and recycled.

As the first of its kind in the US, SB 582 cannot be the model for packaging product stewardship as it does not envision packaging circularity, but instead merely props up the current broken recycling system in Oregon. FPA stands ready to assist the state with real EPR for packaging, one that mirrors jurisdictions in Canada and Europe and follows the principles that Oregon has already laid out for EPR in other programs in the State.

Oregon deserves legislation that actually improves the recycling system and does not simply shift costs to producers and consumers, without proper stakeholder input and oversight. Therefore, we

respectfully request veto of SB 582 so that stakeholders can come together on a common vision for EPR and improving recycling in the State.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alison Keane". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Alison A. Keane, Esq., CAE, IOM