

Bobbi Wilding, Executive Director
Testimony to the
Senate Standing Committee on Environmental Conservation
Assembly Standing Committee on Environmental Conservation
Regarding Packaging Reduction

October 24, 2024

Good morning. Thank you so much for the opportunity to speak about packaging and efforts to reduce it. I'm Bobbi Wilding, Executive Director of Clean+Healthy. Our mission is to build a just and healthy world where toxic chemicals are simply unthinkable.

It's not overstating things to say that the use of packaging is out of control. From the materials directly surrounding the product to those used for bulk transportation to materials used for shipping, there are many times when the packaging material dwarfs the size of the product itself. On top of that, more and more packaging is made from petrochemicals, and contains chemicals that are even more toxic and harmful to people and the planet than the base plastic. In May, the United Nations Environment Programme released a report showing that 7,000 of 13,000 substances associated with plastics are potentially harmful, and 3,200 have one or more property of concern. (1)

Further, the economics of recycling have driven single stream recycling, mingling and degrading materials and making them unfit for return to their highest potential use, and preventing small objects made of ostensibly recyclable materials from fitting into the sorting machinery. Recycling programs also suffer from a rise in plastic packaging that is sent to be recycled but cannot be in real-world settings (such as PVC and polystyrene, certain colored plastics, multi-layered packages that are a mix of materials, etc.)

Whether you look at the waste hierarchy developed in the 1970s or the "circular economy" framework that emerged more recently, the best approach is source reduction, followed by reuse (including remanufacturing and repair), then recycling, and last, disposal.

Clean+Healthy believes that a now-missing and critical component to address the packaging crisis is non-toxic reuse infrastructure. Systems for reuse include reusable single-serving

- **Bans on the worst plastics.** Since many EPR policies have recycling targets, eliminating plastics such as PVC, polystyrene, and polycarbonate is essential since these are highly toxic.
- **Banning false solutions.** We strongly support New York's protective definition of recycling, which expressly prohibits chemical recycling from being counted as recycling and ban so-called "chemical recycling" in the state. We will just perpetuate the current challenges if the approach focuses extensively on recycling, and we know that so-called "chemical recycling" is not economically viable, produces tremendous toxic pollution, and results in very little material. See attached fact sheet.

You have the ability to dramatically shift how products are packaged and delivered to New Yorkers in ways that promote regional infrastructure and jobs, reduce packaging, reduce our reliance on plastic, cut toxic chemicals, and relieve financial burden from municipalities. Clean+Healthy stands ready to support this effort in 2024.

- (1) <https://www.unep.org/resources/report/chemicals-plastics-technical-report>
- (2) <https://www.greenscreenchemicals.org/certified/reusables>