



January 28, 2022

Senator Liz Krueger  
Chair, Senate Finance Committee  
New York State Senate

Assemblywoman Helene E. Weinstein  
Chair, Assembly Ways and Means Committee  
New York State Assembly

RE: S.8008 / A.9008 Part RR – Title 33: Extended Producer Responsibility Act

Thank you for the opportunity to share our perspective on Part RR (Extended Producer Responsibility Act) of the Transportation, Economic Development and Environmental Conservation (TED) section of the Governor's Proposed 2022-2023 Article VII bill which is being heard in the joint legislative hearing. The American Cleaning Institute® (ACI) is the trade association representing the \$60 billion U.S. cleaning products market. ACI members include the formulators of soaps, detergents and general cleaning products used in household, commercial, industrial and institutional settings; companies that supply ingredients and finished packaging for these products; and oleochemical producers. ACI and its members are dedicated to improving the health and quality of life through sustainable cleaning products and practices. ACI's mission is to support the sustainability of the cleaning products industry through research, education, outreach and science-based advocacy.

The optimization of ACI member company product packaging is a priority to deliver the performance of the products ACI members produce. It is for this reason that we have established guiding principles that help us ensure our products which provide hygiene and cleanliness do so in a manner that is environmentally sound, socially responsible and economically viable without compromising the ability of future generations to meet their needs. Our members have collaborated on guidelines to help direct packaging design and manufacturing. And we have charted a roadmap to help us achieve 100% collection and reuse, recycling or composting of cleaning product packaging waste by 2040.

ACI appreciates that the Legislature is lending time to the issue of packaging recycling in the state. New York has an outsized opportunity to be a leader in environmental stewardship policy. Likewise, we recognize that industry has a role to play in ensuring a sustainable future. The proposed bill would place greater responsibility on consumer goods companies to finance the recovery of their packaging. ACI continues to deliberate what a producer responsibility organization should look like to garner the greatest results.

Today, many ACI members are actively participating in and funding initiatives to prevent plastic waste from entering the environment. Here are some of those projects.

- Several ACI members have partnered with [Plastic Bank](#), an award-winning social enterprise that aims to help prevent plastic reaching our oceans by monetizing waste while improving lives.
- [Loop](#) is a global circular shopping platform designed to eliminate the idea of waste by transforming the products and packaging of everyday items from single use to durable, multi-use designs.
- Alongside their recyclability commitments, our members are working to be more transparent about how people can recycle their products. The [How2Recycle](#) label is transforming this by providing clear on-package labels to help all of us understand what we should be placing in the recycle bin.
- The [Alliance to End Plastic Waste](#) aims to find solutions by bringing together people and organizations from across the value chain.
- The Ellen MacArthur Foundation's [Global Commitment for a New Plastic Economy](#) aims to eliminate problematic or unnecessary plastic packaging and ensure 100 percent of plastic packaging can be easily and safely reused, recycled or composted by 2025.

At this time ACI cannot support this legislation in its respective entirety, but sees a greater opportunity for the desired policy goal execution and incentives for product manufacturer packaging innovation through continued conversations between legislators and product manufacturers.

We hope the Legislature will take more time to contemplate ACI input on this policy. ACI looks forward to being a priority stakeholder to the development of such legislation, or providing necessary input regarding the performance of our products and packaging to achieve desired policy goals.

Sincerely,

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