



February 26, 2020

Representative Ralph Tucker of Brunswick- Chair
D - House District 50
15 McKeen Street
Brunswick, ME 04011

Senator Brownie Carson of Cumberland- Chair
D - Senate District 24
PO Box 68
Harpwell, ME 04079

Chairs Tucker and Carson,

On behalf of the members of the Product Management Alliance (PMA), we appreciate the opportunity to express the Product Management Alliances' opposition to LD 2104 - An Act To Support and Increase the Recycling of Packaging.

My name is Kevin Canan, and I serve as the Executive Director of the PMA. By way of introduction, the PMA is a coalition comprised of trade associations and corporations that represent a broad array of consumer products. Our mission is to support market-based extended producer responsibility (EPR) efforts, as well as voluntary incentives for increased recovery and sustainable products and package design. We were founded precisely as a response to the signing of LD 1631 into law in 2010.

PMA's members have long strived to voluntarily recover the products that they manufacture. The PMA understands and appreciates Congress' desire to seek ways to improve the recovery rates of goods. However, we believe that expanding current EPR programs and adding additional EPR programs for additional products, would simply add costly and unnecessary mandates for both the federal government to implement and run this program; as well as for retailers and manufacturers throughout the United States. These costs will ultimately be borne by taxpayers and consumers.

Additional EPR programs would set up a confusing and bureaucratic system of recovery for the residents of the state with similar types of products having very different end-of-life recovery schemes. In addition, these types of restrictive programs would likely to have a chilling effect on manufacturers and retailers doing business in Maine, and as a result business very well could be lost.

PMA members and businesses utilize sophisticated programs in place that continue to increase the amounts of products recovered and recycled through voluntary initiatives. Today recovery rates are at record levels, and they are continually striving to increase these numbers. The existence of these efforts illustrate that new mandates on producers are not necessary to reduce waste and increase recycling and the use of recycled content. Thus, we urge the State of Maine to **strongly examine voluntary, market-based recovery efforts** for increased recovery of

products and oppose any new or further expansion of EPR in the state that are enumerated in the report.

The members of the PMA, and the industries they represent, recognize the desire of the public and policymakers for environmentally responsible business practices. That is why our member companies are voluntarily involved in waste recovery programs, and support recycling where it is economically and logistically feasible.

We hope to have a positive and constructive working relationship with you.

Sincerely,

A handwritten signature in blue ink, appearing to read 'KCCa', with a long horizontal flourish extending to the right.

Kevin C. Canan
Executive Director

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