ASSOCIATION OF HOME APPLIANCE MANUFACTURERS

1111 19th Street NW ➢ Suite 402 ➢ Washington, DC 20036
t 202.872.5955 f 202.872.9354 www.aham.org

TESTIMONY

Jacob Cassady
Director, Government Relations

On Behalf of
The Association of Home Appliance Manufacturers

Before the Maine
Committee on Environment and Natural Resources

HEARING

LD 1645:
An Act to Reduce Plastic Packaging Waste

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Chair Brenner, Chair Gramlich and members of the Environment and Natural Resources Committee, the Association of Home Appliance Manufacturers (AHAM) is opposed to LD 1645, which would prohibit the use of expanded polystyrene (EPS) for packaging. The legislation does not take into account the practicality and impact this prohibition would have on the distribution of appliances.

AHAM represents more than 150 member companies that manufacture 90% of the major, portable and floor care appliances shipped for sale in the U.S. Home appliances are the heart of the home, and AHAM members provide safe, innovative, sustainable and efficient products that enhance consumers' lives.

The home appliance industry is a significant segment of the economy, measured by the contributions of home appliance manufacturers, wholesalers, and retailers to the U.S. economy. In all, the industry drives nearly $200 billion in economic output throughout the U.S. and manufactures products with a factory shipment value of more than $50 billion.

In Maine, the home appliance industry is a significant and critical segment of the economy. The total economic impact of the home appliance industry to Maine is $437.4 million, more than 3,100 direct and indirect jobs, $66.5 million in state tax revenue, and more than $138.3 million in wages. The home appliance industry, through its products and innovation, is essential to consumer lifestyle, health, safety and convenience. Home appliances also are a success story in terms of energy efficiency and environmental protection.

LD 1645 would prohibit the use of plastic packaging that is essential an essential component for the safe storage and distribution of appliances. There is no currently viable alternative to the use of EPS for large appliances/white goods. This proposal would immediately limit the sale and distribution of major appliances in Maine. No jurisdiction, to date, has enacted a similar, blanket ban on EPS packaging.

Appliance Packaging Has Unique Needs and Requirements

Appliance packaging is used to protect the appliance and factory personnel during storage, transport and delivery. The safest and most effective materials for this use are lightweight, can withstand multiple impacts, and maintain their integrity in humid conditions. Unlike smaller, fast-moving consumer goods, packaging for heavy durable goods have different requirements and must be able to ensure the protection of workers during transportation and at distribution centers. Large appliances such as refrigerators, freezers, dishwashers, cooking ranges, washers and dryers are stacked as high as 30 feet so packaging cannot fail while products are stored in warehouse in all environmental climates.

EPS is used around the edge of large appliances to protect it and workers during storage, transport and delivery. EPS is the preferred material for this use since it is lightweight, withstands multiple impacts and maintains its integrity in humid conditions.

Worker safety during transportation and at distribution centers must be considered especially when dealing with large appliances such as refrigerators, freezers, dishwashers, cooking ranges, washers and dryers. Once assembled, major appliances are often packaged, stored and moved in very large warehouses or distribution centers. These facilities often have limited climate control and can experience extreme temperature and humidity changes. Low temperatures can cause packaging materials to become brittle while humidity and heat can affect the packaging's structural integrity and limit the effectiveness of adhesives or the strength of products that are made from fiber.

For safety purposes, it is vital to maintain the structural strength of packaging materials, particularly with respect to major appliances that are housed in stacks that are three or four appliances high. Furthermore, these appliances are often moved around by clamp truck and the packaging must withstand the force of the clamps in order to be moved efficiently. Other paper alternatives such as cardboard, molded pulp or honeycomb can only handle a single impact and loses its integrity in hot and humid environments.

A fiber-based alternative would be larger and heavier, which leads to more truck loads and more warehouse space. It is estimated that there would be an increase of 5-10% in all directions of the packaging, which equates to an increase of about 20-30% more trucks needed to deliver large appliances.

Additionally, thin plastic film is used to protect the finish of appliances as well as the display screen. Fiber alternatives, such as paper, are like sandpaper and would scratch the product and would lead to consumers either accepting a damaged product or refusing delivery and the distributor returning the product to the warehouse. There is no alternative to the use of plastic film to protect the finish of appliances or the display screen.

Conclusion

AHAM appreciates the opportunity to provide comments on LD 1645. Manufacturers of consumer products need flexibility in choosing appropriate materials for packaging their products to avoid situations that cause product breakage and damage during transport, which ultimately increases the lifecycle impact of the product. The current system for appliances and appliance packaging works, and it should be allowed to continue on its successful path. For future reference, my contact information is (202) 202.872.5955 x327 or via electronic mail at jcassady@aham.org.