

1919 S. Eads St. Arlington, VA 22202 703-907-7600 CTA.tech

April 23, 2025

Sen. Denise Tepler, Chair Rep. Victoria Doudera, Chair Committee on Environment and Natural Resources 100 State House Station Augusta, ME 04333

Re: Consumer Technology Association testimony in support for LD 1423 – An Act to Improve Recycling by Updating the Stewardship Program for Packaging

Dear Chair Tepler, Chair Doudera, and Members of the Committee on Environment and Natural Resources:

On behalf of the Consumer Technology Association (CTA), we respectfully submit these comments supporting LD 1423, An Act to Improve Recycling by Updating the Stewardship Program for Packaging.

CTA is North America's largest technology trade association. Our members are the world's leading innovators – from startups to global brands – helping support more than 18 million American jobs. Our member companies have long been recognized for their commitment and leadership in innovation and sustainability, often taking measures to exceed regulatory requirements on environmental design and product stewardship.

Clarifying Language

CTA believes the text of the bill, which updates the current Packaging Stewardship Law, will benefit the implementation of the program by providing additional information, legislative intent, and guardrails to the system. The language included in the bill also harmonizes the program with other state's passed packaging EPR laws, such as Minnesota, which is a product of long negotiations amongst stakeholders. Harmonization across state laws will create more efficiencies for a more successful program. Specifically, CTA believes the following will contribute to a more implementable program that can be successful:

- Toxicity definition to include the phrase intentionally added.
- Additional language clarifying legislative intent of the program to be intended for residential recycling.
- Simplification of reporting from UPCs to products and brands.
- Expanded authority of the Stewardship Organization to develop and administer the system, including the creation of a producer payment system.

Conclusion

In conclusion, CTA supports LD 1423 because of the clarifications it provides to help guide the implementation and administration of the current Packaging Stewardship Law. Creating

Consumer Technology Association* Producer of CES* harmonization between state laws leads to increased efficiencies and reduced costs for producers and consumers which ultimately leads to a more successful system.

Thank you again for the opportunity to provide these comments for LD 1423. We welcome further engagement with the Committee on this topic. If you have any questions about our above comments, please do not hesitate to contact me at apeck@cta.tech.

Sincerely,

Ally Peck Director, Environmental and Sustainability Policy <u>apeck@cta.tech</u> (703) 395-4177