

May 8, 2023

Honorable Chair Brenner and Members of the Joint Standing Committee on  
Environment and Natural Resources

**In re: Opposing LD 1660 An Act to Provide That Advanced Recycling Facilities  
Are Subject to Solid Waste Regulation and That Advanced Recycling Does Not  
Constitute Recycling"**

The Flexible Packaging Association (FPA) is writing you to respectfully request your opposition to LD 1660, "An Act to Provide That Advanced Recycling Facilities Are Subject to Solid Waste Regulation and That Advanced Recycling Does Not Constitute Recycling".

I am Sam Schlaich, Counsel, Government Affairs of FPA, which represents flexible packaging manufacturers and suppliers to the industry in the U.S. Flexible packaging represents over \$39 billion in annual sales; is the second-largest and fastest-growing segment of the packaging industry; and employs approximately 79,000 workers in the United States. Flexible packaging is produced from paper, plastic, film, aluminum foil, or any combination of these materials, and includes bags, pouches, labels, liners, wraps, rollstock, and other flexible products.

Thus, FPA and its members are particularly interested in solving the plastic pollution issue, increasing the recycling of solid waste from packaging, and creating a working, circular economy. This bill provides that advanced recycling technologies are not considered recycling facilities or recycling. This will place Maine at severe competitive disadvantage compared to its neighbor states. Advanced Recycling enables our ability to remake many "hard-to-recycle" plastics which cannot be recycled through mechanical recycling operations. These technologies not only contribute towards circularity goals but create new economic sectors and jobs. Lastly, we would like to point out that LD 1660 is contrary to the laws of 23 states that have passed legislation correctly classifying advanced recycling facilities as manufacturing operations.

For the above outlined reasons, FPA must remain opposed to LD 1660 in its current form and respectfully request an unfavorable report.

In advance, thank you for your consideration. If we can provide further information or answer any questions, please do not hesitate to contact me at 410-694-0800 or [SSchlaich@Flexpack.org](mailto:SSchlaich@Flexpack.org).

Respectfully,

*Sam Schlaich*

Sam H. Schlaich, J.D.

Government Affairs Counsel, FP