



June 13th, 2023
The Honorable, Chair Luz Rivas
Natural Resources Committee
1020 N Street, Room 164
Sacramento, CA 95814

Subject: SB 665 (Allen) Plastic waste: single-use plastics alternatives: working group: CONCERNS

Dear Chair Rivas and Members of the Assembly Natural Resources Committee:

The following organizations, representing a diverse set of California business interests, are writing to express our concerns with SB 665 as drafted. SB 665 calls for the formation of a single-use plastics alternative working group comprised of representatives from various state agencies and boards, without other stakeholder representation. Within the last few years, the legislature has passed multiple bills that address single use packaging waste in the state, including requiring all packaging to be recyclable or compostable, establishing packaging reduction requirements and requiring the increased use of recycled material in new packaging. While we appreciate the on-going dialogue with Senator Allen and his staff, we continue to have questions about how this bill would be implemented.

As drafted, we do not believe the bill outlines a clear approach for how various materials would be evaluated, raising concerns about the quality of the findings. These findings have the potential to significantly impact future packaging policies and material selections. Further, such an important and impactful endeavor might be better managed by a third-party organization not solely comprised of state agency representatives. We ask that you consider amendments to this legislation that both establish a more inclusive working group rather than a state-managed one; and outline a science-based approach to the working group’s evaluation by adding a peer review process or a more detailed procedure that includes additional industry participation. While we appreciate the inclusion of language acknowledging potential trade-offs associated with various material types, we believe additional factors should be considered, including packaging performance needs and potential impacts relative to product protection and food waste reduction.

Producers, material suppliers and others in the packaging value chain continue to advance packaging innovation, efficiency and circularity for all material types.

Thank you for the opportunity to share our views and concerns and we look forward to a constructive dialogue on this important policy issue.

Sincerely,

American Chemistry Council
AMERIPEN
Association of Plastic Recyclers
Biodegradable Products Institute
CJ BioMaterials
Flexible Packaging Association
Foodservice Packaging Institute
Plastics Industry Association
The Recycling Partnership
Western Plastics Association

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