



February 23, 2022

John O’Leary, Deputy Secretary for Energy and the Environment  
Ashley Dougherty, Assistant Secretary for Environment  
Office of Governor Kathy Hochul  
633 3rd Avenue, New York, NY 10017

**RE: Support for 2022-23 New York State Executive Budget proposal part RR,  
Extended Producer Responsibility Act.**

Dear Mr. O’Leary and Ms. Dougherty:

The Pack Green Coalition – a newly-formed industry group that seeks to replace unnecessary plastic in the packaging supply chain with sustainable, environmentally-friendly alternatives – strongly supports part RR of the 2022-23 New York State Executive Budget proposal concerning the establishment of an extended producer responsibility (EPR) program for consumer packaging and paper products in the state. This program is urgently needed to incentivize packaging professionals to improve their sustainability performance and to address the growing solid waste and recycling crisis facing local governments, taxpayers, and our environment.

Pack Green’s mission is to education consumers, lawmakers and brand owners that it is in their collective interest to move away from packaging materials that are not sourced from renewable raw materials and are not reusable or recyclable. Further, local governments are suffering from unreasonable burdens to collect, manage, and market recyclable materials. An EPR program for packaging and paper will shift responsibility for recycling from local governments, taxpayers, and ratepayers to producers by requiring them to engage in end-of-life management of their products and packaging. Furthermore, Governor Hochul’s proposal will incentivize brand owners to reduce packaging waste, make packaging easier to recycle, and boost market demand by using more recycled content, thus fostering a circular economy. This is exactly what our coalition seeks to accomplish as well.

There is no doubt that New York citizens would benefit from this paradigm shift as greater volumes of recyclable materials are captured and processed, leading to increased recycling rates, local green job creation, and increased efficiency from a modernized and improved recycling system. It will also lower greenhouse gas emissions from waste and help achieve climate goals across the state, in keeping with the recommendations of the Climate Action Council.

An effectively designed EPR program, which includes eco-modulation features, will provide the incentives that industry needs in order to replace fossil fuel-based packaging materials

John O'Leary  
Ashley Dougherty  
February 23, 2022  
Page 2

such as plastic and extruded polystyrene foam with fiber, starch and other organic products. This will boost recycling rates dramatically, reduce our dependency on petrochemicals and help address the plastic pollution crisis. In addition, EPR will provide the funds necessary to modernize and expand recycling infrastructure so that municipal programs can handle more materials, accommodate increasingly complex types of packaging, and expand resources to underserved communities to ensure that all residents have the opportunity to recycle.

*We applaud the Governor's continued support for the Extended Producer Responsibility Act for packaging and paper products.* The packaging industry needs to be incentivized to more effectively discharge its environmental stewardship responsibilities. Municipal recycling systems desperately need to be modernized and improved. The time has come for this much-needed product management paradigm shift.

Sincerely,



James T. Asali  
President and CEO  
Pack Green Coalition  
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**[LOCAL GOVERNMENT NAME]**

**Support for Governor Hochul's Extended Producer Responsibility Act for Consumer Packaging**