



**MEMO IN OPPOSITION  
S.4246-B (Harckham) /A. 5322-B (Glick)**

The Manufacturers Association of Central New York (MACNY) opposes S.4246-B/A.5322-B, which would enact the "packaging reduction and recycling infrastructure act" to require companies selling, offering for sale, or distributing packaging materials and products to register with a packaging reduction organization (PRO) to develop a reduction and recycling plan. The bill implements Extended Producer Responsibility (EPR) for paper, cardboard, plastic, metal, glass, and multi-material packaging and would make producers responsible for the costs of consumer waste.

MACNY is a non-profit organization that represents more than 300 manufacturing companies and businesses throughout the Upstate/Central New York region, including paper, plastic, metal and glass product producers. Our members are already using innovative strategies to re-use and recycle materials. Certain members incorporate 100% recycled paper into their production process, leading the way in environmental sustainability in the United States. These companies employ thousands of team members in family-sustaining jobs at New York facilities, while annually investing directly into the state's economy.

Under this proposed legislation, the packaging reduction organization would spend producer assessments on a range of activities, and individual producers would not have a role in planning or directing these expenditures. Plus, they could become liable if the plan that is implemented does not support mandated levels of recycling.

This legislation disregards practical consideration and would adversely impact consumer choice and costs, likely resulting in a reduction of smaller-sized offerings. And while the bill's intent is to lower municipal expenditures for managing packaging and single-use products, it does not require municipalities to pass on any tax reduction benefits to residents.

For the reasons stated above, MACNY respectfully opposes this legislation, without significant amendments. We welcome the opportunity to discuss our concerns regarding this bill with you directly.