



February 18, 2022

Members of the Maryland House Environment and Transportation Committee

RE: HB 700 - Labeling, Marketing, and Advertising for Recycling

The American Cleaning Institute® (ACI) would like to share its perspective on this legislation that the House is considering. ACI is the trade association representing the \$60 billion U.S. cleaning products market. ACI members include the formulators of soaps, detergents and general cleaning products used in household, commercial, industrial and institutional settings; companies that supply ingredients and finished packaging for these products; and oleochemical producers. ACI and its members are dedicated to improving the health and quality of life through sustainable cleaning products and practices. ACI's mission is to support the sustainability of the cleaning products industry through research, education, outreach and science-based advocacy.

The optimization of ACI member company product packaging is a priority to deliver the performance of the products ACI members produce. It is for this reason that we have established guiding principles that help us ensure our products which provide hygiene and cleanliness do so in a manner that is environmentally sound, socially responsible and economically viable without compromising the ability of future generations to meet their needs. Our members have collaborated on guidelines to help direct packaging design and manufacturing. **We have also charted a roadmap to help us achieve 100% collection and reuse, recycling or composting of cleaning product packaging waste by 2040.**

ACI is concerned that this legislation sends the wrong message to consumers – that recycling is broken. Our members' commitments (and current achievements) to recycle more material will require more robust recycling systems and more material in the recycling waste stream, not less. It is very possible that this legislation would severely impact packaging that is widely accepted for recycling across the country but may not conform with the entirety of criteria that would be established under this bill. Complicating the matter is the fact that many states already require chasing arrows on certain packaging types. Our members, whose success stems from dynamic supply chains to ensure critical cleaning products are readily available to consumers when needed, would be hindered by packaging types that could otherwise be made available were it not for the new labeling requirements proposed by this bill. This bill fails to recognize important sustainable achievements like light-weighting packaging or using innovative packaging materials which offer positive environmental benefits.

We are also concerned that this legislation ignores the important work that our members conduct to comply with federal guidance and other widely accepted industry best practices that impact consumers across the country and not just in Maryland. For example, the Federal Trade Commission's Guides for the Use of Environmental Marketing Claims requires "competent and reliable scientific evidence" before making unqualified claims which our members take very seriously. Many include the Sustainable Packaging Coalition's How2Recycle label that clearly communicates recycling instructions to the public based on stringent recycling capability and design elements. This bill would forego these important best practices.

We ask that Maryland take a more holistic approach to determining the recyclability of packaging. Manufacturers are already committing significant resources to reduce packaging, incorporate reuse strategies and make it recyclable to as many consumers as possible. Defining recyclability with such limiting criteria will be disruptive to the supply chains that service the entire country.

Sincerely,

A handwritten signature in black ink, appearing to read "Brennan Georgianni". The signature is fluid and cursive, with the first name being more prominent.

Brennan Georgianni
Director, State Government Affairs
BGeorgianni@cleaninginstitute.org