

HOUSE BILL REPORT

HB 1150

As Reported by House Committee On:
Environment & Energy

Title: An act relating to improving Washington's solid waste management outcomes.

Brief Description: Improving Washington's solid waste management outcomes.

Sponsors: Representatives Berry, Donaghy, Ryu, Ramel, Farivar, Mena, Alvarado, Duerr, Reed, Fitzgibbon, Callan, Macri, Doglio, Fosse, Simmons, Street, Pollet, Kloba, Nance, Davis, Ormsby, Salahuddin and Hill.

Brief History:

Committee Activity:

Environment & Energy: 1/21/25, 2/11/25 [DPS].

Brief Summary of Substitute Bill

- Requires producers of certain paper products and packaging (covered PPP) to participate in and fund the operations of a producer responsibility organization related to the postconsumer management of covered PPP and other recycling-related activities.

HOUSE COMMITTEE ON ENVIRONMENT & ENERGY

Majority Report: The substitute bill be substituted therefor and the substitute bill do pass. Signed by 12 members: Representatives Doglio, Chair; Hunt, Vice Chair; Berry, Duerr, Fey, Fitzgibbon, Kloba, Mena, Ramel, Stearns, Street and Wylie.

Minority Report: Do not pass. Signed by 7 members: Representatives Dye, Ranking Minority Member; Klicker, Assistant Ranking Member; Abbarno, Abell, Barnard, Ley and Stuebe.

Staff: Jacob Lipson (786-7196).

This analysis was prepared by non-partisan legislative staff for the use of legislative members in their deliberations. This analysis is not part of the legislation nor does it constitute a statement of legislative intent.

Background:

Solid Waste Management in Washington.

Under the state's solid waste management laws, local governments are the primary government entity responsible for implementing state solid waste management requirements. The Department of Ecology (Ecology) also has certain roles in overseeing the administration of solid waste management laws. Ecology is responsible for working cooperatively with local governments as they develop their local solid waste management plans. County and city solid waste management plans are required to contain certain elements, including a waste reduction and recycling element, and a recycling contamination reduction and outreach plan. Under state laws addressing the local planning and management of solid waste, a waste management hierarchy is established for the collection, handling, and management of solid waste. This hierarchy prioritizes in descending order: (1) waste reduction; (2) recycling, with source separation of recyclable materials as the preferred method; (3) energy recovery, incineration, or landfill of separated waste; and (4) energy recovery, incineration, or landfill of mixed municipal solid wastes.

The Utilities and Transportation Commission (UTC) regulates private service providers that transport solid waste, garbage, and recyclables from residential sites. The certificate to transport garbage and recyclables sets the geographic areas in which the service provider is authorized to collect waste. Cities and towns have the authority to provide their own solid waste collection services or to contract for solid waste collection services, including collection of source-separated recyclable materials. Counties may contract for the collection of source-separated recyclable materials in unincorporated areas of the county. Solid waste collection services provided or contracted by cities and towns or contracted by counties are not subject to UTC regulation. Materials collected for recycling are transported to material recovery facilities which receive, compact, repackage, or sort materials for the purposes of recycling.

Extended Producer Responsibility and Product Stewardship Programs.

The Legislature has enacted laws that require the establishment of extended producer responsibility or product stewardship programs for the management of six types of products: (1) electronic products; (2) light bulbs that contain mercury; (3) photovoltaic solar panels; (4) pharmaceuticals; (5) paint; and (6) batteries.

In general, the state's extended producer responsibility and product stewardship programs require producers to participate in a stewardship organization or program that is responsible for the collection, transport, and end-of-life management of products covered by each program. Ecology is responsible for the oversight of the state's extended producer responsibility and product stewardship programs, with the exception of the Pharmaceutical Stewardship Program, which is overseen by the Department of Health.

Postconsumer Recycled Content Requirements.

In 2021 the Legislature established minimum recycled content requirements applicable to

three categories of plastic products or products in plastic containers: trash bags, household and personal care product containers, and plastic beverage containers. Producers subject to minimum postconsumer recycling content (PCRC) requirements were required to register with Ecology and pay fees to cover Ecology's administrative costs related to minimum recycled content standards beginning in 2022.

Summary of Substitute Bill:

Producer Participation in a Producer Responsibility Organization.

Producers of paper products and packaging (covered PPP) must participate in a producer responsibility organization (PRO) that is required to develop, implement, and finance a statewide program for covered PPP. The program must encourage redesign to reduce environmental and human health impacts and to reduce generation of covered PPP waste. Only one PRO, other than any individual producers registering as a PRO, may be formed for the first plan implementation period.

For each covered material, a single specified person—either the material's manufacturer, brand licensee, brand owner, importer of record, distributor of the material in Washington, or another person assigned contractual responsibility as a producer—is defined as the producer responsible for participation in a PRO. Producers do not include government entities, nonprofit organizations, or entities that have de minimis revenue or introduce de minimis volumes of covered PPP.

Packaging is defined to include various materials, including single-use items that facilitate food or beverage consumption. Fourteen categories of materials are exempted from qualifying as covered PPP, including packaging for products like medical devices, drugs, hazardous materials, products that are distributed only to commercial or business entities, or that meet specified recycling rates and other criteria. Producers and PROs may also petition Ecology to temporarily exclude certain categories of packaging from being covered PPP.

Significant registration and plan implementation deadlines applicable to producers and PROs include:

- By January 1, 2026, each producer must appoint a PRO.
- By March 1, 2026, a PRO must submit an annual registration to Ecology on behalf of its producers.
- By July 1, 2026, a producer must be a member of a registered PRO.
- By September 1, 2026, a PRO must submit an annual registration fee to Ecology to fund Ecology's costs to implement, administer, and enforce Ecology's PRO-related duties. The initial 2026 registration fee is to be a one-time payment to Ecology to cover all of Ecology's costs through June 30, 2027. The Department of Labor and Industries' (L&I) costs to administer and enforce minimum compensation standards at material recovery facilities must be included in the fees paid to Ecology by a PRO.
- By October 1, 2028, and every five years after, a PRO must submit a plan to Ecology

for approval.

- By March 1, 2029, a producer that is not a member of a PRO may not introduce covered materials into Washington.
- By January 1, 2030, or within 6 months of plan approval, a PRO must implement an approved plan.
- By July 1, 2031, a PRO must submit an annual report to Ecology.

In implementing the program, PROs must meet a variety of specific obligations to enable Ecology oversight and with respect to the PRO's relationship with its member producers. If more than one PRO is established, a coordinating body and process to prevent redundancy must be established.

An advisory council is established to review all activities by PROs, and to advise Ecology and PRO implementation of their duties, including a number of specific named responsibilities. Ecology must establish the advisory council and appoint 19 advisory council members representing specified interests by January 1, 2026. Ecology must provide administrative and operating support to the council.

Plans and Program Funding.

By October 1, 2028, and every five years afterwards, a PRO must submit a plan to Ecology describing the proposed operation of programs that incorporate the findings and results of needs assessments. A PRO must submit a draft plan or plan amendment to the advisory council for comment at least 60 days prior to submitting the plan to Ecology. Ecology must review draft plans or plan amendments submitted by PROs and must approve the plan or amendment, approve the plan or amendment with conditions, deny the plan or amendment, or request additional information on the plan or amendment. Draft plans and plan amendments must also be posted on Ecology's website for public comment prior to Ecology approval.

Plans must include 22 specified categories of information, including any categories of information required by Ecology by rule. As a component of their plan, PROs must also submit a contingency plan demonstrating how the activities in the plan will continue to be carried out by another entity, if needed, in the event that the PRO can no longer carry out plan implementation. PROs must develop and maintain a public website containing specified information, and must implement education and outreach activities meeting specified standards and outcomes.

A PRO may charge member producers a fee using a method it determines to be equitable, so that the aggregate fees charged to member producers are sufficient to pay the PROs costs in full until the PRO has a plan approved by Ecology. A PRO with an approved plan must annually collect a fee from each member producer that varies by the amount of the producer's covered PPP, reflects program costs for different types of covered PPP, discourages the use of covered PPP that are not on an Ecology-adopted statewide list for collection, incentivizes the use of materials and designs that reduce environmental and

human health impacts of covered PPP, and meets other criteria. Fees collected from members may not be used for lobbying or political advocacy activities that would require reporting to the Public Disclosure Commission or under the Federal Election Campaign Act.

Statewide Lists, Covered Paper Products and Packaging Collection Requirements, and Needs Assessment.

Ecology must develop a list of covered PPP determined to be recyclable or compostable statewide. Ecology must complete the initial statewide lists by October 1, 2026, and publish updated lists within 30 days of approval of a PRO's plan, taking into account changes proposed in the PRO's plan. In developing statewide lists, Ecology must distinguish between materials suitable for:

- residential recycling collection;
- residential composting collection;
- public place collection; and
- alternative collection.

Ecology must consult with specified parties, including the advisory council, and consider 13 specified criteria in developing the lists. Ecology may select a third-party consultant to help with statewide list development. A PRO may propose a covered PPP for exclusion or addition to a statewide list.

Materials that are not identified by Ecology as suitable for residential collection may not be collected as part of a residential recycling program, unless the materials are collected as part of a pilot program of limited duration and geographic scope. Collection services for covered PPP determined to be suitable for residential recycling collection must be available wherever residential garbage collection services are available, except where a county adopts an ordinance specifying that covered PPP on the residential recycling collection list must instead be collected through drop-off collection in areas of the county in which solid waste collection is regulated by the UTC.

PROs must implement an alternative collection program meeting specified criteria for materials on the alternative collection list developed by Ecology.

By December 31, 2026, Ecology must complete a preliminary needs assessment that uses the statewide lists developed by Ecology in October 2026, and that considers information from recent recycling-focused assessments and reports carried out by Ecology. The preliminary needs assessment must include 11 types of specified contents, including information related to volumes of introduced and collected covered PPP, and current recycling and composting system infrastructure, capacity, and services provided.

The needs assessment must be updated to include additional information by December 31, 2027, and updated every five years afterwards. The updated needs assessments must include 18 additional types of specified contents, including evaluations of existing waste

systems, recycling and other waste management outcome rates, and proposed solid waste management outcome rates, collection methods, and infrastructure investments.

Ecology may adjust the content of a needs assessment to inform upcoming PRO plans. Ecology must initiate a consultation process in carrying out needs assessments, and must contract with a third party to conduct needs assessments. Draft needs assessments must be made available for comment, and Ecology must respond in writing to needs assessment comments and recommendations of a PRO or the advisory council.

Service Providers, Material Recovery Facilities, and Infrastructure.

Beginning in January 2026, entities—including government entities—that provide services for covered PPP (service providers) must register with Ecology by submitting specified information. Material recovery facilities (MRFs) receiving covered PPP must register with Ecology as service providers and must submit additional information to Ecology related to the volumes and quality of covered PPP at the MRF and specified aspects of MRF operations.

As applicable, service providers that receive PRO reimbursement under a plan must provide covered services, including collection, transfer, transport, processing, recovery, preparing, or other management, for:

- covered PPP included on statewide collection lists adopted by Ecology;
- a refill system; or
- reusable covered PPP.

Service providers must:

- register annually with Ecology;
- submit invoices to the PRO;
- meet performance standards in the PRO's plan;
- ensure that covered PPP are sent to responsible markets that meet specified environmental, health, and other criteria;
- provide documentation to the PRO related to services provided; and
- display the service provider's price, minus PRO reimbursement, when invoicing customers and must pass on applicable portions of reimbursements to customers through solid waste rate reductions or credits.

Reimbursements for covered services may only be provided to service providers that meet performance standards established in a PRO plan. PRO plans must provide a methodology for reimbursement rates that consider estimated revenue by service providers from the sale of covered PPP. Reimbursement rates must be annually updated, and must be set based on specified collection, transfer, sorting, and processing costs. Service providers must be reimbursed at least 50 percent of net costs in 2030, at least 75 percent of net costs in 2031, and at least 90 percent of net costs in 2032 and beyond. Service providers retain all revenue from the sale of covered PPP unless otherwise agreed to by the service provider. Service providers may charge a fee for covered services of covered PPP to the extent that PRO

reimbursement does not cover all costs of services. A PRO must establish a reimbursement dispute resolution process using third-party mediators.

Government entities are not required to operate as service providers under a plan, but government entities are eligible to be registered service providers that receive reimbursement. The existing authority of counties and cities to provide waste management services to residents or to contract for waste management services is not restricted.

The PROs must use a competitive bidding process and publicly post bid opportunities for infrastructure investments, except that preference must be given to existing facilities and providers of services. With certain exceptions, producers and PROs may not own any portion of infrastructure used to fulfill covered PPP obligations.

Owners or operators of a MRF that annually manages more than 25,000 tons of covered products must ensure workers are paid minimum industry standard compensation, beginning in 2028. The minimum standard compensation is a wage and usual benefits package equal to or greater than the combined hourly wage and usual benefits package set by a collective bargaining agreement covering similar or equivalent work in a county. If there is more than one collective bargaining agreement, the higher rate applies. L&I is to investigate and enforce these wage requirements.

Covered Paper Products and Packaging Performance Targets and Statewide Requirements.

Each PRO must, based on the needs assessment, propose performance targets for reuse rates, return rates, recycling rates for materials delivered to responsible markets, composting rates, and PCRC and plastic source reduction rates. The PRO plans must provide separate methodologies for determining whether each category of target is being met, and Ecology may require that a PRO obtain third-party certification of performance target activities or achievements. Ecology must establish a process for a PRO to propose to count materials sent to facilities that use alternative recycling processes towards recycling rates, and may approve a PRO's proposal based on the evaluation of specified criteria. A PRO that fails to meet a performance target in an approved plan must file an explanation with Ecology within 90 days of the PRO's annual report and propose a plan amendment specifying changes in operations designed to achieve the performance target.

Ecology must establish statewide rate requirements and dates by which those requirements must be met for recycling, composting, reuse, return, plastic source reduction, and PCRC in covered PPP. Statewide rate requirements must be reviewed by Ecology every five years, and be updated if warranted. The PROs must ensure the statewide rate requirements are met.

Department of Ecology Administration and Enforcement.

Ecology may adopt rules to implement, administer, and enforce requirements related to PROs and producers. Ecology must follow specified processes for calculating and receiving the fees that PROs must pay to cover Ecology's oversight costs. If requested by

Ecology for purposes of determining producer or PRO compliance or for implementing requirements related to producers and PROs, a person must provide Ecology any information that person has or may reasonably obtain.

Ecology may impose civil penalties of up to \$1,000 per violation per day on a producer or PROs for initial violations and up to \$10,000 per violation per day for subsequent violations. Ecology must provide written notification and offer information to producers out of compliance, providing at least one notice of violation prior to assessing a penalty and providing 60 days for the producer to come into compliance. Ecology may issue corrective action orders, revoke a PRO's plan approval and require implementation of the contingency plan, and take other specified enforcement actions related to a PRO. Upon a request from the advisory council, Ecology must consider the appropriateness of the use of an enforcement authority.

Penalties and orders are appealable to the Pollution Control Hearings Board. Collected penalties must be deposited in the Recycling Enhancement Account, which is used for providing grants to local governments to support local solid waste financial assistance programs.

Local Solid Waste Planning and Solid Waste Collection Company Oversight.

Beginning January 1, 2030, the programs for the collection of source-separated residential materials under local comprehensive solid waste management plans must:

- provide for curbside collection of source-separated recyclable materials from single-family and multi-family residences wherever curbside garbage collection services are provided;
- include covered PPP on the statewide residential recycling collection list adopted by Ecology; and
- must include service standards established under PRO plans for curbside collection frequency, container size, and method of collection.

Local comprehensive solid waste management plans may incorporate PRO programs by reference to fulfill source-separated recyclable material collection requirements. Local solid waste comprehensive plans must be amended by January 1, 2030, to align with PRO-related provisions, or else a model comprehensive solid waste plan amendment developed by Ecology will apply in the jurisdiction.

The PROs may periodically provide educational materials promoting household waste reduction and recycling to public and private waste haulers.

The UTC must review PRO reimbursement of service providers and require solid waste collection companies regulated by the UTC to deliver covered PPP only to responsible markets that meet specified environmental, health, and other criteria. The UTC, in its duties providing oversight of solid waste collection company rates, must include costs related to curbside recycling collection performed under a PRO plan in the solid waste collection

company's rate base.

Reporting Requirements and Studies.

Beginning in 2031, a PRO must submit an annual report covering the preceding calendar year's plan implementation activities and data. Ecology must review annual reports submitted by a PRO and make them available for public comment. If an annual report does not meet requirements, Ecology must notify the PRO of the reasons for denial, and the PRO must then submit a revised annual report.

In consultation with any PROs, Ecology and the Department of Revenue (DOR) must study the impacts of producer requirements on the litter rates of covered PPP, and possible improvements to the structure of the litter tax that do not include increasing the tax rate or expanding the types of covered PPP under the PRO that are subject to the tax. Ecology, in consultation with the DOR, must provide recommendations to the Legislature on the applicability of the litter tax to covered PPP and improvements to the litter tax structure by January 1, 2030.

By January 31, 2032, Ecology must complete a third-party contracted study that evaluates facilities managing covered PPP and at facilities operating in the state receiving covered PPP as recycled feedstock, including the facilities' working conditions, barriers to solid waste operations ownership by women and minorities, and access by multi-family building residents to solid waste collection infrastructure. Recommended actions from the study must be considered for inclusion as part of future PRO plans.

By September 1, 2038, Ecology must contract with an independent consultant to analyze the first seven years of program implementation and submit a report to the Legislature.

Other.

Beginning in 2029, each PRO must annually fund and implement a reuse financial assistance program (Reuse Program) to reduce the negative environmental impacts of covered PPP through reuse. The PROs must collectively fund the Reuse Program at \$5 million in 2029; an amount which is subject to an annual inflation adjustment and to adjustment if the PRO's reuse and return rate targets or statewide requirements go unmet.

Public and private entities are eligible recipients of financial assistance under the Reuse Program, and the program must solicit applications using an open and competitive process and select applications through an evaluation of environmental, human health, social, and economic benefits, cost-effectiveness, and the needs of economically distressed or overburdened communities. A PRO may own infrastructure used for purposes of the Reuse Program.

Certain activities related to producer and PRO responsibilities are exempt from state antitrust laws and provided immunity from federal antitrust laws.

It is declared to be the Legislature's intent that if a bottle deposit return system is enacted in

the future, it will be harmonized with PRO-related requirements in specified ways and must include a two-year transition period before the expiration of an approved plan.

Substitute Bill Compared to Original Bill:

The substitute bill makes the following changes to the original bill:

- exempts, as de minimis producers, agricultural employers with less than \$5 million, adjusted annually for inflation, in gross revenue in Washington from consumer sales of agricultural commodities under the employer's brand name;
- specifies that: (1) beverage distributors; and (2) persons that produce agricultural commodities under the brand or trademark of another person are not eligible to be contractually assigned responsibility as a producer for another person who would otherwise be the producer of a covered material;
- includes, in the calculation of the fee paid to Ecology for PRO program administration and oversight costs, the costs of L&I to implement minimum compensation standards at MRFs;
- limits the applicability of minimum compensation standards for MRFs to those managing at least 25,000 tons of covered materials annually, and specifies that minimum compensation standards take effect October 1, 2028;
- limits the reimbursement that PROs must provide to service providers to no less than 50 percent of net costs by 2030, 75 percent by 2031, and 90 percent beginning in 2032;
- delays by two years—until 2029—the PRO's funding of the Reuse Program;
- specifies that the PRO must fund the Reuse Financial Assistance Program in an amount of at least \$5 million per year, or an amount sufficient to achieve reuse and return rate target requirements;
- details the process by which Ecology will calculate and communicate annual fee payment information to the PRO, and specifies that the initial one-time registration fee during the startup of the program must be adequate to cover Ecology's costs through June 30, 2027;
- authorizes Ecology to approve, with conditions, a PRO plan, and specifies a process for a PRO to submit a second plan revision in the event that a first PRO plan and a revised plan are not accepted by Ecology;
- requires service providers to pass on to customers, in delivering curbside collection services, the applicable portion of reimbursements from the PRO in the form of solid waste rate reductions or credits;
- requires the 2032 equity study by Ecology to address facilities in Washington that receive covered materials as recycled feedstock, in addition to those that manage covered materials;
- allows up to 8 percent of a PRO's plastic source reduction performance target to be met through an alternative compliance formula based on the use of postconsumer recycled content;
- specifies that a PRO may own or partially own infrastructure as needed to fulfill a plan for the covered materials of an individual producer that registers as a PRO, or for

- an alternative collection program;
- prohibits PROs from using fees collected for plan implementation purposes to fund federal election activities, in addition to state election activities; and
- specifies that PRO obligations do not affect the Department of Agriculture's authorities or duties with respect to pest and noxious weed control and quarantine measures.

Appropriation: None.

Fiscal Note: Available.

Effective Date of Substitute Bill: The bill takes effect 90 days after adjournment of the session in which the bill is passed. However, the bill is null and void unless funded in the budget.

Staff Summary of Public Testimony:

(In support) The companies responsible for creating packaging entering households should be responsible for helping with the costs of properly managing packaging wastes. By making producers responsible for packaging, they will have an incentive for designing environmentally preferable products and reducing packaging waste management costs. Producer reimbursement of local government recycling costs will reduce the service costs borne by solid-waste ratepayers. There is not credible information that this program is likely to increase costs of products sold by retailers. The prime sponsor has extensively negotiated this bill with stakeholders, including taking over 300 meetings. Microplastics are a human health risk, and the production of plastics perpetuates environmental injustice by disproportionately impacting people of color. Changes to our state's recycling system will allow the achievement of far higher recycling rates than the status quo. Recycling is a business, and this bill will grow recycling in Washington. A robust needs assessment is needed in order to determine how to carry out a successful recycling program. The approach in this bill is modeled after successful extended producer responsibility designs in other states, including a recently adopted Minnesota law. Producers of packaging products support this bill as striking an appropriate balance and being well-designed to achieve intended recycling outcomes. A few additional changes to policy elements contained in the bill, such as the plastic source reduction requirements and reuse financial assistance program, will help improve it and make it more easily implementable by producers.

(Opposed) Washington's recycling system is among the best in the nation, and achieves a high recycling rate. This proposal would hand control of the recycling system to the producers that are causing the problems that the bill seeks to solve. This program will increase the price of retail consumer goods. The bill would better stimulate recycling by driving market demand for reused plastic through postconsumer recycled content requirements. The timelines in the bill will be challenging to implement, and provide

significant authority to the Department of Ecology. A needs assessment that evaluates local needs must be completed prior to the state committing to an extended producer responsibility program. Agricultural producers should be exempted from program participation requirements. Beverage distributors should not be assigned responsibility as a producer under the program, which should instead hold beverage producers accountable.

(Other) Several other states have implemented similar extended producer responsibility legislation. This program could increase the price of retail goods. The prime sponsor has done a lot of work to make this proposal workable for grocery stores, but the bill could still have concerning impacts on grocery stores. It is important to carry out a needs assessment before implementing any changes to the recycling system. Counties depend on landfill disposal fees in order to pay for solid waste programs. The advisory board should include a durable product manufacturer. Manufacturers of flexible packaging want to be able to compete on a level playing field against manufacturers of other types of packaging.

Persons Testifying: (In support) Representative Liz Berry, prime sponsor; Alex Truelove, Biodegradable Products Institute; Brian Pontious, Ingevity; Andrew Hackman, AMERIPEN; Dylan de Thomas, The Recycling Partnership; Allison Kustic, Association of Plastic Recyclers (APR); Carl Schroeder, Association of WA Cities; Anne McEnerney-Ogle, City of Vancouver; Brad Boswell, Washington Beverage Association; Peter Steelquist, Surfrider Foundation Washington; Michael Gonzales, Joint Council of Teamsters #28; Dr. Mark Vossler, Washington Physicians for Social Responsibility; Scott DeFife, Glass Packaging Institute; Erin Gagnon, DTG Recycling; Michael Smaha, Can Manufacturers Institute; Fiona Bell, Coalition for High Performance Recycling (CHPR); Kelsey Hulse, EPR Leadership Forum; Intisar Bengel, SC Johnson; and Caleb Weaver, Ridwell.

(Opposed) Vicki Christophersen, Washington Refuse and Recycling Association; Rick Vahl, Waste Connections; Jay Balasbas, Basin Disposal; Brian Coddington, Sunshine Disposal and Recycling; Ted Carlson, Sanitary Service Company; Michael Connors, Washington Potato & Onion Association; Scott Hazlegrove, WA Beer & Wine Distributors' Association; Lyset Cadena, WM (Waste Management); Erin Raden, Consumer Brands Association; and Peter Godlewski, Association of Washington Business.

(Other) Mark Johnson, Washington Retail Association; Katie Beeson, Washington Food Industry Association (WFIA); Travis Dutton, Washington State Association of Counties; Brandon Houskeeper, NW Grocery Retail Assoc.; John Richard, Flexible Packaging Association; and Jacob Cassady, Association of Home Appliance Manufacturers (AHAM).

Persons Signed In To Testify But Not Testifying: None.