

Written Testimony of Erin Simon
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on
“Extended Producer Responsibility”
for the
Senate Committee on Environment and Public Works

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Chairman Carper, Ranking Member Capito, and members of the Committee, thank you for the opportunity to testify on the topic of Extended Producer Responsibility commonly referred to as EPR. My name is Erin Simon, and I am the Vice President and Head of Plastic Waste and Business at World Wildlife Fund (WWF). Before my time at WWF, I was a packaging engineer at HP for 10 years, responsible for the design and implementation of laser jet printer and media packaging. The topic of today’s hearing is one that is near and dear to my heart and one that I can speak to from several different perspectives.

As the world’s largest science-based conservation organization, WWF has been working to help both people and nature thrive for over 60 years. Our international network of offices works across 100 countries to deliver on this mission through our efforts to conserve and restore nature; to reduce humanity’s environmental footprint; to ensure the sustainable use and management of natural resources; and to help address the biggest global environmental challenges, including the increasingly pressing challenge of plastic pollution.

WWF works at every level, collaborating with governments, local communities, and some of the world’s biggest companies to deliver innovative solutions that protect both nature and the people who depend upon it.

The Challenge of Plastic Pollution

The topic of today’s hearing is critically important. I believe we can all agree that plastics are essential to modern life, enabling us to solve once insurmountable challenges. But the price for this innovation is staggering. Plastic pollution levels are rapidly reaching unsustainable levels. It is estimated that 11 million metric tons of plastic waste enter our oceans every year. To put that number in context, it is the equivalent of a dump truck of plastic waste every minute.¹ Without effective action to address this problem, the environmental, economic, and health costs will continue to mount and may become unfixable.

Plastic is now everywhere. It can be found in nearly every corner of the planet – from your city sidewalk to the depths of the ocean. Plastic pollution is harming some of the world’s most fragile marine ecosystems, like coral reefs and mangroves, and more than 2,000 species around the world have been found to encounter plastic pollution in their natural habitats. It is estimated that up to 90% of seabirds and 52% of sea turtles have mistakenly eaten plastic.²

Plastic pollution also places a significant toll on local economies, and it is increasingly clear that it is a public health threat. As plastic breaks down into microplastics, it finds its way into our water and food – and into our bodies. Microplastics have been found in more than 100 aquatic species, including fish, shrimp, and mussels – many of which end up on our dinner plates. While we don't yet know the full impact of plastic pollution on our health, research increasingly shows that there is real cause for concern.

This is also an issue that most Americans agree on: at a time when we seem divided on most topics, there is an overwhelmingly consensus that plastic pollution is a significant concern. WWF just commissioned new public polling on this issue. It has not yet been released, but I want to share a preview of its findings. 85% of the public strongly or somewhat agree that "Plastic waste pollution is a serious and concerning problem that requires immediate political action to solve." It also shows that while the majority of the respondents are doing what they can in their daily lives to reduce plastic pollution, 71% of the public thinks that the Federal government and manufacturers of plastic products have a clear responsibility for solving this problem.

WWF believes plastic is a cornerstone for many of the innovations that frame modern life. But plastic has no place in nature, where it too often ends up. We most commonly rely on plastic as a single-use resource in a linear system where products and packaging are created, used, and thrown away. We need to transition away from this linear, business-as-usual model to a circular economy. This will require a multi-faceted approach that protects our environment, our communities, and our economies. It is also an untapped opportunity for the United States to lead in the creation of a circular economy for plastics use. The U.S. generates the most plastic waste in the world; it can also lead the way in innovating solutions that the rest of the world can emulate.

If we invest now to transform our plastics economy from a disposable one to a circular one, we can save more than \$4 trillion in direct, environmental, and social costs by 2040.³ And this helps to explain why there has been a groundswell of initiatives in recent years, led by companies, cities, states, and civil society organizations such as my own to reduce and ultimately prevent plastic waste. We are increasingly seeing major corporations leading the way, including many that WWF partners with on efforts to reduce plastic waste in their operations and supply chains.

But a truly circular economy – one that is regenerative and restorative – calls for us to reimagine the way we create, use, source, design, and dispose of products and packaging. For that to happen in the United States, the solutions can't just be driven by the private sector. We need comprehensive policies to address circularity on a national scale.

Among the most effective policies for achieving these outcomes is Extended Producer Responsibility (EPR), which is responsible for robust recycling rates in countries around the world and creates powerful incentives for companies to reduce their plastic footprint, design for recyclability, and mitigate the risk of plastic leakage into the environment. Several U.S. states have adopted EPR legislation or are in the process of considering it, notably Colorado and California. And these state-level systems are providing the models and the lessons learned that can inform a federal approach to EPR, which is what is ultimately needed.

Currently, the United States operates a patchwork of largely ineffective recycling systems, which has resulted in our embarrassing honor of having the lowest recycling rates of any developed country in the world. While the U.S. generates the most plastic waste in the world, it only recycles roughly 9% of it. Progress is being made, but federal leadership – particularly from Congress – could significantly accelerate this process and serve as a catalyst for holistic system change. A clear and coordinated federal framework would enable companies to deploy circular solutions more effectively while providing us an opportunity to invest in comprehensive circular solutions more broadly.

EPR and policies like it are the only mechanisms that will generate the billions of dollars required to address the recycling infrastructure challenges we experience in the United States and establish a truly circular economy. Federal policies – not a hodgepodge of state policies – will be what ultimately drives collective action that ensures that the public and private sectors collaborate in the management of packaging waste in a manner that is beneficial to communities and the environment.

There has been a surge in support for EPR, both by state policymakers and private sector actors, and the time is ripe for federal leadership to nurture this moment and take it from a potential solution to accepted practice. In addition to organizations such as my own, you have a community of partners from all industry sectors asking for your help and willing to provide you with an array of resources to continue building on that momentum. Following, I outline how and why EPR works as a solution to plastic pollution, the principles of good EPR from WWF’s perspective, and the various benefits that EPR can yield, aside from just increased recycling rates.

Extended Producer Responsibility

In business, there is a commonly held principle of “Global Producer Responsibility,” “which states that the producers are responsible both for the production and safe use of their product. Extended Producer Responsibility (EPR) follows a similar approach and is defined as the additional shift of responsibility for the end-of-life management of products and materials to the producers.¹ The objective of EPR is to share the physical, organizational, and/or financial responsibility for waste management between producers and the government, thus reducing the burden on municipalities. This creates more resourceful and effective schemes that increase the end-of-life collection, allow for environmentally sound treatment of collected products and waste reuse and recycling; and provide incentives for manufacturers to design resource-efficient and low-impact products.²

As a result, EPR creates positive impact up and down the value chain, making them an ideal tool to push the economy towards circularity. To close the loop towards plastic circularity, it is necessary to both end the disposal of end-of-life plastics and stop the use of virgin feedstocks by

¹ Lifset, R. et al. (2013) Extended Producer Responsibility. National, International and Practical Perspectives

² E. Watkins, S. Gionfra, J-P. Schweitzer, M. Pantzar, C. Janssens and P. ten Brink (2017) EPR in the EU Plastics Strategy and the Circular Economy: A focus on plastic packaging

reducing plastic production in the first instance and by replacing virgin feedstocks with secondary raw materials. These systems have been implemented in packaging since the late 1980s, but a significant increase in adoption can be seen in the last decade. Nearly 400 different systems have been adopted in several countries around the globe and in some U.S. states.³ The introduction of EPR has shown pronounced increases in collection and recycling rates and can reduce the need for virgin feedstocks and lower costs for secondary raw materials. The components for EPR schemes include:

- Materials and products included in the scheme
- Producers subject to EPR regulation
- Obligations companies must comply with
- Organization of the EPR scheme
- Setting of collection, reduction, and recycling targets
- Establishment of a fee system and for factors such as product recyclability and proportion of recycled material in products

The coverage of costs for collection, sorting, and recycling has been identified as one of the major strengths of EPR systems because they can ease the burden on the public. While EPR cannot be considered a silver bullet, it has been most effective with different policy tools, such as disposal regulation and tax incentives. There are several factors which can hinder the effective roll-out of EPR schemes, including lack of alignment among stakeholders, lax enforcement and social safeguards, inadequate recycling targets, as well as social and cultural factors including lack of public awareness.

Overall, the establishment of EPR systems has contributed to the introduction of efficient separate collection schemes for specific waste streams, including plastic packaging. EPR shifts the investment and operational costs for waste management of used packaging at least partly to industry.

EPR Benefits More than Just Recycling

EPR can create positive environmental, social, and economic outcomes by transitioning the way products are designed and manufactured to maximize natural resource value and recyclability or reusability.

It's also an issue where consumers are engaged on this issue and want to act. Individuals need the ability to make sustainable choices that fit with their everyday lives. Governments and business have the responsibility to be good stewards of our resources and ensure that consumers can access products and services that allow them to live their values.

1. Economic Outcomes:

- o **Cost Savings:** EPR can result in cost savings for governments, businesses, and consumers by internalizing the environmental and social costs associated with product disposal and pollution. By shifting responsibility and financial burden back to

³ Daniel Kaffine and Patrick O'Reilly (2015): What have we learned about Extended Producer Responsibility in the past decade? A survey of the recent EPR economic literature

- producers, EPR encourages them to adopt more sustainable practices, ultimately reducing the overall cost of waste management and environmental remediation.
- **Market Innovation and Competitiveness:** EPR encourages product innovation and design optimization to minimize environmental impact throughout the product lifecycle. American companies gain a competitive global advantage by reducing regulatory compliance risks, environmental impacts, and tapping into growing consumer demand for sustainable products and practices.
 - **Reduced Risk:** EPR supports design standards and increased consistency and quality in secondary materials. This reduced risk often results in more private investment in the system.
 - **Job Creation and Economic Opportunities:** The implementation of EPR programs stimulates job growth and economic development in sectors related to waste management, recycling, and resource recovery. By investing in new technologies and modalities, infrastructure upgrades, and workforce training, EPR fosters the emergence of new employment opportunities and supports local economies.
 - **Recycling Market:** EPR ensures that waste management industry is audited to make sure that material collected gets recycled. It can develop markets for hard-to-recycle materials.
 - **Strengthened Domestic Supply Chains:** EPR will create stronger supply chains for domestic materials by giving producers access to high-quality recycled content. Reliance on imported materials or exported recyclables will ensure that existing American products become new American products and reduce dependency on volatile materials markets.

2. Environmental Outcomes:

- **Waste Reduction:** EPR incentivizes producers to design products with end-of-life considerations in mind, promoting recyclability and access to recycling services, and potentially advancing uptake of reuse systems. Producers pay for the net cost of collecting and recycling the packaging they put on the market, internalizing the system's performance into their operations. Producers are also incentivized to design products and select materials with a circular economy in mind through ecomodulation – bonus or malice fees that reward innovative design and penalize system disruptors. This leads to a reduction in the amount of waste generated and an increase in sustainable practices while fully funding and investing in responsible recycling systems.
- **Resource Conservation:** By encouraging recycling and recovery of materials from products at the end of their life cycle, EPR reduces the demand for virgin resources. This helps conserve natural resources such as timber, minerals, and fossil fuels, leading to a more sustainable use of finite resources.
- **Pollution Prevention:** EPR aims to reduce the environmental impact associated with the disposal of products and packaging. Through effective recycling programs, EPR helps mitigate pollution of air, water, and soil.

3. Social Outcomes:

- **Equitable Access to Waste Management Solutions:** EPR programs ensure that all communities, regardless of their socio-economic status or geographic location, have

- access to convenient and efficient recycling services. This promotes environmental justice by addressing disparities in access to essential services and minimizing the burden of waste on marginalized communities.
- **Environmental Justice:** By reducing waste and advancing producer accountability, EPR advances environmental justice by reducing the amount of waste sent to landfills or incinerated, beginning to rectify the legacy impacts of waste often placed on underserved communities. Producer responsibility must also ensure that new and expanded infrastructure accounts for and minimizes community-level impacts.
 - **Better Product Transparency:** EPR systems with design standards require more product transparency for overall system efficiency. Better product transparency means there is greater visibility into problematic and toxic chemicals. With better visibility, the opportunity to reduce use and exposure is easier to advance and monitor.

Ecomodulation as an Aspect of an EPR System

EPR is a holistic solution that does more than simply fund and improve recycling systems. It can also be a supporting framework for ensuring quality of materials to match recycling technology and enhancing the quality and consistency of end markets. This is done through a key element of EPR called ecomodulation. Ecomodulation is a fee structure that rewards companies for 1) using less plastic and more sustainable material and 2) designing materials that can be efficiently processed through recycling infrastructure. When ecomodulation is included in an EPR scheme, the program requires companies to pay fees for their packaging material and incentivizes them to be more sustainable. This provides the potential for them to pay significantly less into the EPR scheme for using more sustainable material. Ecomodulation also disincentivizes the use of problematic materials and designs that decrease the quality of all materials being recycled. Ultimately, this creates powerful financial incentives for producers to transform their packaging portfolio. For example, in some Canadian provinces, the material used for shopping bags costs almost three times more than their paper alternatives, and plastic to-go packaging costs six times more than its paper counterpart⁴. To avoid paying high EPR fees, companies will pursue cost savings by using less plastic, designing packaging for recyclability, and using more sustainable material. International companies are already using significantly less plastic in countries with EPR than they do in the United States.

Principles of Good EPR

The concept of EPR is not new, as other countries around the world have been utilizing it as a recycling and packaging solution for decades. There is a solid evidence base of what has worked and what hasn't, based on the experience of these other countries.

We have learned that in the case of EPR, the interests of industry and governments are completely aligned. They both share a goal to build a best-in-class recycling system and prioritize efficiency. To aid in this effort, WWF has developed a set of principles that are broadly supported across industry and the NGO community, including an industry-led governance model.

⁴ 2023 Canada Circular Materials National Provincial Material Fee Rates

A flexible EPR framework, sensitive to regional differences, would ideally be established at the Federal level. This framework would steer the transition from a linear to circular economy nationally and link policies to increase the quality and quantity of recyclables collected with goals for the use of those materials in new products. This means establishing material-specific, numeric targets for recyclability, recovery, and use of recycled content. The EPR framework should optimize the performance of recovery systems and promote coordination with related initiatives such as tipping fee surcharges, deposit return systems, and new infrastructure financing programs. The overarching principles for a successful system are one that:

- Generates strong environmental, social, and economic outcomes in an efficient and accountable manner
- Provides convenient service to consumers
- Creates a financially sustainable model
- Offers producers access to recovered material for closed loop recycling
- Supports environmental justice objectives in recycling systems

In this type of model, governments still have full control over the system but hand the day-to-management and funding obligations to an industry-led Producer Responsibility Organization (PRO). Right now, Colorado's EPR system is the closest to our principles that we have in the United States. We anticipate that Colorado will become the model for what good EPR looks like in this country. By contrast, poorly designed EPR programs that do not create incentives for improvements are instead designed to fund status quo recycling operations. These systems often cost over twice as much without meaningful results. Below are the program parameters for a successful EPR model.

Clear Scope of Products Affected and Programs Funded

In a successful EPR program, products include all types of consumer goods packaging and printed paper with products labeled clearly, simply, and consistently for consumers to indicate recyclability and the appropriate manner for disposal and recycling. The list of materials that can be recycled is consistent across the jurisdiction, in this case the United States.

The program funds 100 percent of the net cost (net of scrap value) for residential recycling of packaging and printed paper including both single- and multi-family dwellings. This also includes education and outreach programs. However, it excludes costs for industrial, commercial, and institutional waste management and for disposal of residential material. Ideally, the fee setting principle should outline this explicitly and should not include any additional charges (e.g. a per-item or unit tax). Ecomodulation is usually described in the PRO section of legislation.

Legislation also states the overall program performance objectives, with initial recovery targets for packaging and printed paper of 50 to 60 percent. These objectives depend on the region and ramp up over time. Recyclability targets should be set to both eliminate package components that hinder recycling and encourage design for recycling, along with recycled content requirements

that complement program objectives. Overall, it is important to set targets with reasonable yet ambitious timelines.

Centralized Program Management

A single, non-profit PRO composed of the responsible parties that create any covered product for commercial use, sale or distribution manages the funding system for the entire jurisdiction, with professional staff answerable to a producer-led board of directors. Complementary systems such as deposit return programs could have their own PRO and should work together to maximize overall system performance. There are instances where it is ideal to opt for a multi-PRO model. Policymakers can and should guide alignment on this, including through legislation.

The PRO develops and implements a plan to achieve the program goals stated in legislation, developed in consultation with other stakeholders and usually mapped out over five to seven years. The legislation spells out timeframes and parameters for regular plan updates and review.

After plan approval, the PRO sets fees for producers following the cost principles below, implements needed recycling system changes, and coordinates infrastructure financing sources to modernize systems. Additionally, the PRO establishes funding and reimbursement arrangements with recyclers, evaluates and reports on performance, and markets recycled materials. Obligated producers have the “right of first refusal” to their share of recovered material at market terms.

The PRO does not typically operate recovery vehicles and facilities, but contracts for those services either directly or through reimbursement of private sector or municipal costs to provide the services.

Transparent Cost Principles

The PRO sets producer fees by material type (e.g., PET, aluminum, corrugated cardboard) based on the cost to recycle the material minus its value in the scrap market. Because costs and commodity values change over time, fees are reset typically once per year.

Producers pay fees based on these net costs with fees assessed based on the weight of various materials sold, with a de minimis threshold set to relieve the smallest producers of obligation. Producers typically update sales annually and the data is treated confidentially. It makes sense to exclude producers from these programs with less than a certain amount of sales yearly. The PRO modifies fees based on environmental and social factors (i.e., ecomodulation) to incentivize product design decisions. Fee reductions might be considered, for instance, for products that are the most recyclable, contain recycled content, or have a low carbon footprint. Surcharges, or disruptor fees, may apply to difficult to recycle materials with the highest fees charged to materials that cannot be recycled.

The overhead costs of running the PRO and the government’s cost of rulemaking, oversight, and enforcement are also embedded in the producer fees.

Defined Role for Government

Enabling legislation should set the scope of the EPR program and its goals to assure a level playing field among producers of consumer goods packaging and printed paper. The legislation also specifies the role of government and how those activities are funded. The designated government agency evaluates and approves the PRO's plan for achieving program goals, monitors program progress, and provides enforcement.

Similarly, government agency costs for rulemaking, plan approval, oversight, and enforcement activities are reimbursed by the PRO, with those costs embedded in the producer fees. No additional government funds are drawn from the producer organization, other than reimbursements to local and regional governments for recycling services as noted above. The amount of government reimbursement is publicly available as is the way government funds are allocated.

Policy Solutions are Needed at All Levels

We have already seen some strong progress at the state-level towards EPR and recommend that the federal government works with states that have taken the lead while seeking to create more consistency across the U.S. where possible. There is an opportunity for federal policy to create a precedent where state policy is not progressing. In some instances, states are already out in front. Following advocacy by corporate leaders, NGOs, and other stakeholders, Colorado enacted the United States' first full EPR legislation in June 2022. Colorado is now leading the nation in implementing EPR for all packaging, which will make collection easy for consumers, incentivize best practices for sorting and processing, and pair producer responsibility with access to high quality materials. The EPR model in Colorado shows a path forward that other states can follow, and one which we hope will eventually be embraced across the nation.

California's Plastic Pollution Prevention and Packaging Producer Responsibility Act, SB54, will require an analysis of necessary action to address the impacts of single use plastic packaging, establish measures to track progress on removing some of the most problematic packaging, and require that packaging be recyclable in practice. SB54 is the first legislation to require numeric amounts for source reduction by number and by weight by 25% by 2032, reflecting the fact that tracking and data are crucial to the creation of a circular economy.

Both Colorado and California provide examples for Congress to learn from as it considers what a federal approach to EPR could look like. WWF hopes that the conversation this Committee is leading will help pave the way for Congress to develop and enact such federal EPR legislation and call attention to the considerations and advantages of reduction, reuse, as well as material alternatives to plastics as we seek to address the problem of plastic waste and pollution. WWF is not alone in this desire – our proven track record working with the private sector to improve their footprints and advocate for sound policy speaks to a broader alignment on this vision.

Growing Corporate Leadership

In 2019, WWF launched ReSource: Plastic, an activation hub to support companies that want to translate their plastic commitments into tangible change in their business practices. A key element was the establishment of an analytical tool, the ReSource Footprint Tracker, to measure corporate action and progress year over year.⁵ Businesses have made real progress to reduce waste within their own supply chains. For instance, Colgate-Palmolive is making significant progress in transforming toothpaste packaging through its recyclable tube technology that it is freely sharing with other companies and industry stakeholders. This is the type of redesign of difficult-to-recycle packaging that we need to see more of, and sharing the details of the technology is helping to move the entire system. The Coca-Cola Company has also made strides to lower their plastic footprint, announcing an industry-leading goal to have at least 25% of its beverage volume worldwide sold through reuse systems by 2030 and delivering 14% of its total beverage volume in reusable packaging in 2022. The scaling of reuse is a critical step to ultimately reduce our dependency on single-use plastic, and we expect more companies to follow suit in the coming years.

However, despite many large, influential businesses stepping up and doubling their initiatives to fight plastic waste, plastic pollution continues to grow. While companies can make progress addressing plastic pollution through individual action, we need to target the root cause of the issue in order to address the plastic crisis at the scope and scale necessary: we have a linear materials system when it should be circular. Achieving this broader goal will require advocating for wide scale, holistic systemic change and driving collective action through coalitions. We need smart plastic policy, on both the national and global levels, to enable the frameworks that allow voluntary initiatives to be even more impactful. Business is critical to helping us get there. We also need collaboration across industry that ensures we do not have one company succeeding in a vacuum and instead prioritizes pre-competitive sharing of solutions.

After years of work on business transformation, companies acknowledge that voluntary action is not sufficient to fix our broken system. To meet this challenge, many U.S. companies have come together in the United States to form a united front in the fight to end plastic pollution, such as with the U.S. Plastics Pact in 2020 and OneSource Coalition in 2021. Through the U.S. Plastics Pact, companies work together with NGOs, government agencies, and research institutions toward impactful national targets focused solution-driven actions that adapt the U.S. systems that produce, use, recover, and process plastic. Via OneSource, WWF brings together 25 non-governmental and private sector organizations in support of Extended Producer Responsibility, environmental justice and international leadership on policy advancements that address plastic waste.

In September 2022, WWF and Ellen MacArthur Foundation launched the Business Coalition for a Global Plastics Treaty with 85 organizations committed to raising ambition for corporate action and support for the upcoming global treaty. The Coalition, now with over 200 organizations, develops ambitious policy recommendations, engages with treaty negotiators, and brings business cases for benefits and necessity of an effective treaty that sets common goals, rules, and

⁵ For more information see [Transparent 2022 Annual ReSource: Plastic Progress Report](#)

obligations to be implemented in national jurisdictions. For businesses and investors, this means creating a level playing field and preventing a patchwork of disconnected solutions.

Many of these companies have been vocal in their support of EPR.⁶ See below for some sample [quotes from consumer products companies on EPR](#):

“As part of our vision to build a world where packaging never becomes waste, PepsiCo actively supports policies used to promote a more sustainable, circular economy for packaging. We believe that Extended Producer Responsibility (EPR) programs are one good example. EPR, if properly designed and funded, can provide significant support to recycling systems. PepsiCo was proud to champion the EPR legislation that recently passed in Colorado as an example of something that we believe will work for all key stakeholders.”

- Lauren Cotter, Head of Global Sustainable Packaging, PepsiCo

“We need well-functioning, standardized recycling systems to increase the collection of our bottles and cans, so we can reuse the material back into our packaging. We appreciate the opportunity to partner with WWF, our industry colleagues, NGOs and others to help advance well-designed EPR systems and build a circular economy for our packaging.”

- Kurt Ritter, Vice President of Sustainability, Coca-Cola North America

By continuing the surge of collective action and putting in place the right policies that will create an environment for corporate actors to implement sustainable practices, government stakeholders can help companies achieve their plastic reduction objectives and enable them to go even further.

Conclusion

We must mend the broken and complex system that has gotten us to where we are today, built on high demand for unnecessary virgin plastic and ineffective waste management. To address the plastic crisis at the scope and scale necessary, we need holistic systemic change and smart plastic policy on both the national and global levels. We need an all-in approach – from policymakers to industry leaders, from cities to individual consumers – so the plastics and materials that we manufacture, and use can be recycled into valuable products that we use again and again.

Ultimately, a circular economy is the only sustainable way forward. It begins with a reevaluation of our use and disposal of plastic that centers both environmental justice and human health outcomes. It will require the elimination of unnecessary plastic, substantial increases in the reuse, recycling, and composting, and a shift to sustainable inputs and new production and consumption models for the remaining, necessary materials.⁷ Though this reality may seem ambitious, there are policies and changes we can work toward today to create more efficient systems that will ensure current and future generations produce and consume goods with minimal impact. EPR is

⁶ <https://www.worldwildlife.org/blogs/sustainability-works/posts/why-companies-support-epr-for-better-recycling-systems>

⁷ For more information see [WWF Position: The Role of Reuse in a Circular Economy for Plastics](#)

an effective policy mechanism that allows for significant economic, health, and environmental benefits. There is strong evidence from abroad and from the pilot program in Colorado that it works.

The American public wants to see action to address plastic pollution. Leading American businesses are calling on EPR at the federal level. While plastic pollution is a crisis, it is an eminently solvable one, with the right policies in place. Congress can help by providing the economic incentives and policy landscapes that will speed their deployment. Already, we have seen the passage of the Save Our Seas Act and Save Our Seas 2.0, and Members of this Committee have introduced the Recycling and Composting Accountability Act, the Recycling Infrastructure and Accessibility Act, and the Break Free From Plastic Pollution Act, which includes the Protect Communities from Plastics Act. These efforts demonstrate the bipartisan recognition of a growing problem and the keen interest in addressing it. We believe that federal EPR provides another opportunity for Congress to pass bipartisan legislation – and a potentially transformational one in our efforts to address plastic pollution. As we can see with today’s discussion, and through other hearings and legislation, there is growing interest in convening stakeholders to work together on this issue. I believe I speak for many of our partners when I say we are grateful for your Committee’s leadership and guidance on this vital issue, and we look forward to working with you to advance real and effective policy solutions to this challenge.

There is no time to waste if we want to achieve the vision of a more resilient future in which we protect human and environmental health and eliminate plastic in nature.

Thank you for the opportunity to testify today and thank you for the Committee’s leadership in moving this conversation forward. We are happy to assist in any way that we can as this dialogue continues.