



July 26, 2022

Delegate Michael J. Webert
Agriculture Chesapeake and Natural Resources - Agriculture Subcommittee
Virginia House of Delegates

RE: HB 647 / HB 709 / HB 918

Thank you for the opportunity to share our perspective on House Bills 647, 709 and 918 which are being heard before your subcommittee. The American Cleaning Institute® (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. And we have charted a roadmap to help us achieve 100% collection and reuse, recycling or composting of cleaning product packaging waste by 2040.

ACI appreciates that the General Assembly is lending time to the issue of packaging recycling in the state. We recognize that industry has a role to play in ensuring a sustainable future. These bills would place greater responsibility on consumer goods companies to finance the recovery of their packaging after they have been sold and distributed across the country. ACI continues to deliberate what a producer responsibility organization should look like to garner the greatest results.

At this time ACI cannot support these measures in their respective entirety, but see a greater opportunity for the desired policy goal execution and incentives for product manufacturer packaging innovation through continued conversations between legislators and product manufacturers.

We hope the Legislature will take more time to contemplate ACI input on these bills. ACI looks forward to being a priority stakeholder to the development of such legislation, or providing necessary input regarding the performance of our products and packaging to achieve desired policy goals.

Sincerely,

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