



Inspiring Generations of Play

1375 Broadway • Suite 1001 • New York, NY 10018  
t. 212.675.1141 • e. info@toyassociation.org

January 24, 2023

The Honorable Mark M. Nakashima, Chair  
House Committee on Consumer Protection & Commerce  
Hawaii State Capitol  
415 South Beretania Street  
Honolulu, Hawaii 96813

RE: House Bill 1326 (Lowen) - Packaging Waste Reduction Program Mandate—OPPOSE

Dear Chair Nakashima, Vice Chair Sayama, and Members of the Committee:

I write today on behalf of the Toy Association (TTA), a not-for-profit trade association representing approximately eight hundred (800) toymakers, marketers, distributors, and retailers, large and small, located throughout North America. Toy Association members have been working diligently toward environmental goals by improving the recyclability of their toys, reducing packaging, and utilizing more sustainable materials in their products and packaging. While studies indicate that toy packaging accounts for less than 1% of the typical household's annual waste stream, all industries have an obligation to do what they can to reduce their environmental impact.

The Toy Association supports investment in improved recycling infrastructure through extended producer responsibility (EPR) in the form of a uniform national program which provides responsible entities with clear standards and criteria, and reasonable implementation timeframes. However, as states begin to act on their own, we encourage collaboration across jurisdictions to create viable end markets and streamline the compliance process for industry. Although no other state has fully implemented their packaging EPR program, they all include strong Producer Responsibility Organizations at their core. This bill doesn't establish such a framework. Other concerns include definitions of producer and covered producer, lack of defined scope of the needs assessment, and use of funds from the Packaging Waste Special Fund. Additionally, with the implementation plan completion date of July 2027, it only leaves 2 ½ years to reach the goal of 70% reduction in the amount of packaging deposited in landfills or incinerated, this is simply not enough time.

We applaud the state's efforts to evaluate their solid-waste system and improve the management of packaging materials in the municipal waste stream; however, this bill sets overambitious goals without providing the appropriate foundation or structure to achieve them. For these reasons, the Toy Association must respectfully oppose HB 1326. Thank you for considering our concerns.

Sincerely,

Erin Raden  
Director, State Government Affairs  
The Toy Association