



June 19, 2018

The Hon. Ron Young, Chairman
House Committee on Economic Development, Commerce and Labor
1 Capitol Square
Columbus, OH 43215
RE: Support for HB 625

Good afternoon, Chairman Young, Vice Chairman Riedel, Ranking Member Lepore-Hagan and members of the Committee:

I appreciate the opportunity to be here today. My name is Matt Seaholm and I am the executive director of the American Progressive Bag Alliance or APBA.

The APBA represents American packaging manufacturers and recyclers, and we would like to commend the members and the committee for considering House Bill 625, legislation that would ensure regulatory uniformity for auxiliary containers in Ohio. Additionally, we'd like to specifically thank Representatives Lang and Lipps for their leadership on this important issue.

The APBA, on behalf of our members and their thousands of employees, as well as retail and restaurant customers from around the state ask for your support for HB 625. This bill would ensure that future regulations regarding auxiliary containers are made at the state level, which will provide consistency across the state and help avoid the punitive costs and red tape complications of regulatory patchworks.

For certain industries and issues, it makes sense for there to be state-level regulatory consistency. Auxiliary containers fall under this category. States including Indiana, Florida, Michigan, Missouri, Iowa, Idaho, North Carolina and Wisconsin have led the way on this issue, and have already established legislation that clarifies the need for auxiliary container policies to fall under the purview of states, in order to uphold economic health and competitiveness in service to businesses and consumers alike.

Unfortunately, we're seeing regulatory patchworks pop up in states where there are no uniformity laws. This shortsighted approach is leading to regulatory chaos and confusion not just for the industry, but also for the states where they are enacted. When auxiliary containers are regulated, banned or taxed at the local level, it's common to see rules that vary from city to city and from county to county. Additionally, local ordinances – whether ban or fee-based – commonly establish varying manufacturing standards for products. Those standards are rarely consistent among localities, leading to varying regulations from one jurisdiction to another. Likewise, the compliance reporting standards laid out in these ordinances are often different.

These varying laws and regulations have serious and inevitable drawbacks. They can lead to increased confusion, a sizeable and unnecessary regulatory burden on the industry, and an increase in costs that are ultimately passed on to the consumer. It's imperative that states proactively address this issue before they're faced with the same problems we're already seeing in places across the country that have not passed uniformity laws.

For all of these reasons – economic health and competitiveness, job protection and consumer savings – we believe auxiliary container policy is best determined at the state level. Thank you for your consideration and support of this legislation. I'm happy to address any questions.



Matt Seaholm
Executive Director, American Progressive Bag Alliance

CC: Hon. Craig S. Riedel, Vice Chair
Hon. Michele Lepore-Hagan, Ranking Member
Hon. Steven Arndt
Hon. Thomas E. Brinkman, Jr.
Hon. Bill Dean
Hon. Ron Hood
Hon. Larry Householder
Hon. Brigid Kelly
Hon. Al Landis
Hon. P. Scott Lipps
Hon. Alicia Reece
Hon. Michael Sheehy
Hon. Dick Stein
Hon. Thomas West