

PRINTING United Alliance is committed to advancing sustainability efforts that positively impact society, the environment, and the economy. The Alliance focuses on policies that enhance the print industry's "triple bottom line" – people, planet, and profit – through innovative manufacturing methods aimed at a circular economy. This involves the use of processes and materials that promote sustainability, reduce waste, and ensure efficient resource use. Key policy areas include recycling, extended producer responsibility, and chemical safety. These initiatives are designed to support the growth and success of the print market while also contributing to the well-being of current and future generations.

Transforming the National Recycling System

The printing industry, which utilizes a diverse range of materials such as paper, plastic, cardboard, vinyl, metals, and textiles, faces varying recycling rates across these substrates. A one-size-fits-all mandate is impractical given the diverse materials used in printing and packaging. Instead, a targeted approach is needed, recognizing specific recycling challenges and rewarding achievements in recycling. The printing industry supports legislative initiatives that aim to increase federal investment in recycling infrastructure, enhance markets for recycled commodities, and establish national standards to improve waste collection efficiency and reduce consumer confusion.

Print and the Circular Economy: Extended Producer Responsibility (EPR)

Sustainable packaging design, development, and distribution are critical priorities for the print industry. The growing consumer awareness of plastic waste and stagnant recycling rates have led to increased calls for Extended Producer Responsibility (EPR) laws. Five states have now passed EPR laws, and several more states introduced similar legislation, highlighting the need for a national EPR framework. EPR shifts the responsibility for end-of-life product management to producers. EPR laws typically impose fees or taxes on all covered products, which can include those produced by print and packaging companies. EPR will result in increased costs for consumers, print buyers, and manufacturers. For the predominantly small businesses in the printing industry, these costs can be particularly challenging. While the printing industry is committed to environmental stewardship, it opposes federal EPR legislation unless it excludes highly recycled products, invests in recycling infrastructure, and is both technically and economically feasible for manufacturers.

Advancing Chemical Safety

Chemical safety in the workplace and the manufacturing of safe products are of paramount importance to the printing industry. The Alliance supported the landmark Toxic Substance Control Act (TSCA) of 2016, which provides a framework for regulating chemicals used in manufacturing. The industry actively engages in the ongoing implementation and interpretation of TSCA to ensure that regulations balance chemical safety with industry innovation. The Alliance advocates for simplified and streamlined chemical reporting processes, with an emphasis on reporting at the point of raw materials import. This approach reduces confusion within global supply chains and ensures that chemical safety policies are based on sound scientific data. Policies should prioritize mitigating the risks of harmful chemicals while considering the necessity and innovation

of chemicals in print manufacturing with the best available science and weight of the evidence as dictated by the statute. Recent changes to the risk assessment process by the Environmental Protection Agency (EPA) have introduced new “whole chemical” requirements that fail to account for existing employee protections mandated by other agencies, such as the Occupational Safety and Health Administration (OSHA). The printing industry calls for a reformed risk assessment process that integrates these protections and is based on the best available science and weight of evidence.

Actions for Leaders to Take

- Congress should pursue policies that increase recycling rates by investing in infrastructure, developing realistic end markets for less recycled materials, and creating national standards to reduce consumer confusion. These policies should avoid broad mandates and instead acknowledge voluntary industry successes. Additionally, lawmakers must consider the economic impact on small businesses and less profitable industries within the supply chain to ensure that recycling policies are inclusive, solutions-oriented, and economically feasible for all participants.
- A federal EPR law should provide uniformity to end-of-life packaging policy across state lines. This legislation must support recycling infrastructure and innovation and consider the economic impact on small manufacturers. Congress should ensure that any federal EPR fee structure directly supports recycling infrastructure and includes targeted exemptions for print packaging that meets or exceeds high recycling rates. Additionally, the legislation should carefully consider the cost burdens on small businesses to ensure that the policy is fair and manageable.
- Congress should conduct oversight to ensure adequate resources for and timely implementation of TSCA. Congress should maintain chemical safety management and harmonized reporting at the federal level to avoid an ineffective patchwork of state safety rules. Congress should consider public and workplace risk, cost-benefit, and small business impact analyses when seeking to update and advance chemical safety policy by requiring the EPA to incorporate existing protective measures as required by other agencies.

Summary

The Alliance emphasizes the need for inclusive, practical policies that support the industry’s sustainability goals. Key areas of focus include enhancing recycling systems through targeted investments and standards, promoting feasible EPR laws that support recycling infrastructure and protect small businesses, and advancing chemical safety with science-based regulations. By addressing these, the Alliance aims to contribute positively to the environment, economy, and society, ensuring a sustainable future for the print industry and the communities it serves.