



July 16, 2026

The Honorable Gus M. Bilirakis, Chairman
The Honorable Jan Schakowsky, Ranking Member
House Committee on Energy and Commerce
Subcommittee on Commerce, Manufacturing, and Trade
2125 Rayburn House Office Building
Washington, DC 20515

Re: Support for H.R. 6832 - the Packaging and Claims Knowledge (PACK) Act

Dear Chairman Bilirakis and Ranking Member Schakowsky:

AMERIPEN, the American Institute for Packaging and the Environment, respectfully submits this statement in strong support of H.R. 6832, the Packaging and Claims Knowledge (PACK) Act, in advance of the Commerce, Manufacturing and Trade Subcommittee's hearing on July 22, 2026. Thank you for providing a platform to discuss the challenges facing the packaging and consumer packaged goods industries, as well as the solutions the PACK Act offers.

AMERIPEN is the only national trade association representing the entire consumer packaging value chain, focused solely on packaging policy, and bringing together material suppliers, packaging manufacturers, consumer packaged goods companies, retailers, and other organizations involved in the design, manufacture, use, and recovery of consumer packaging.

Packaging is indispensable to the Nation's economy and to everyday life. It protects food, medicine, and other essential products, supports product safety and efficient commerce, and provides consumers with critical information. The U.S. packaging industry contributes approximately \$537.91 billion in annual economic output, representing approximately 2.5 percent of the Nation's gross domestic product; supports nearly 1.7 million American jobs; generates more than \$117.73 billion in wages and benefits; and contributes approximately \$43.46 billion in federal, state, and local tax revenues.

The PACK Act establishes a nationally consistent framework for substantiating voluntary recyclable, compostable, and reusable claims on consumer-facing packaging. At its core, the bill is both a consumer protection measure and an affordability measure — ensuring Americans can trust the claims on their packaging while sparing them the hidden costs of a fragmented regulatory system. AMERIPEN strongly supports the PACK Act because it strengthens consumer confidence, enables interstate commerce, and preserves the Federal Trade Commission's longstanding role in protecting consumers from deceptive marketing practices.



I. The Problem

For decades, the FTC's "Green Guides" have provided guidance for environmental marketing claims, including "recyclable," "compostable" packaging claims. The Guides have shaped industry practice by promoting truthful, non-deceptive marketing. They are, however, guidance documents—not a harmonized national statutory framework—and therefore do not create legally enforceable, nationally uniform labeling requirements.

In the absence of a federal statutory standard, states have increasingly adopted differing requirements governing these claims. The resulting fragmentation creates inconsistent consumer information, growing compliance burdens, and unnecessary complexity for companies distributing products nationwide. Manufacturers, retailers, and packaging suppliers must continually redesign packaging, maintain multiple compliance processes, and navigate differing legal requirements. Every dollar devoted to duplicative compliance is a dollar that cannot be invested in product innovation, manufacturing efficiency, recycling infrastructure, or other improvements that benefit consumers. While companies work diligently to manage these costs, they are not absorbed in a vacuum and may ultimately be passed down the supply chain, making everyday products more expensive for the consumers Congress is trying to protect. A single, credible national standard protects consumers twice over: once by ensuring claims are truthful, and again by preventing the price increases that inevitably accompany duplicative, state-by-state compliance regimes – and all while supporting recycling, composting, and reuse of packaging.

The central policy question is straightforward: who should establish the national standard for claims of recyclable, compostable, and reusable on packaging, Congress or a patchwork of differing jurisdictional requirements?

II. The Solution

The PACK Act answers that question through a carefully tailored consumer-protection framework. It neither regulates packaging design nor establishes recycled-content mandates or material-composition requirements. Instead, it addresses one narrow issue: voluntary recyclable, compostable, and reusable claims appearing on consumer-facing packaging.

Nationally Consistent Third-Party Certification. The PACK Act does not require companies to make recyclable, compostable, or reusable claims on consumer-facing packaging. However, when a company voluntarily makes one of these claims, it must substantiate it through an accredited third-party certification. This independent verification strengthens consumer confidence, ensures credible, consistent substantiation, and provides a national safeguard



against deceptive or unsupported claims without navigating a patchwork of state labeling requirements.

FTC Administration with U.S. Environmental Protection Agency Technical Consultation.

The legislation builds upon the FTC's longstanding expertise in preventing deceptive marketing claims while directing the Commission to consult with the EPA on technical matters related to recycling, composting, and reuse systems.

Narrow Preemption that Preserves State Authority. The PACK Act preempts only non-identical state requirements governing the specific environmental claims addressed by the legislation. States retain full authority to administer broader environmental laws and programs outside the Act's limited scope.

AMERIPEN respectfully urges the Subcommittee to schedule a markup and advance H.R. 6832 for consideration by the full Committee in short order. As state labeling requirements continue to diverge, Congress has an opportunity to establish a coherent national framework that provides consumers with clear and reliable information, promotes affordability through greater regulatory efficiency, and supports the free flow of interstate commerce. AMERIPEN believes that consumer protection, affordability, and supporting recycling are not competing goals but complementary ones, and H.R. 6832 advances each of them.

AMERIPEN stands ready to work with Congress, the FTC, EPA, state officials, consumer organizations, and all interested stakeholders to ensure that the consumer-facing environmental marketing claims of recyclable, compostable, and reusable remain truthful, reliable, and nationally consistent. Thank you for the opportunity to submit this statement for the record.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Lynn Dyer', written in a cursive style.

Lynn Dyer
President
AMERIPEN

Cc: Members, Subcommittee on Commerce, Manufacturing and Trade