



New York Farm Bureau

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MEMORANDUM OF OPPOSITION

Senate Bill 1464 (Senator Harckham) / Assembly Bill 1749 (Assemblymember Glick)

AN ACT TO AMEND THE ENVIRONMENTAL CONSERVATION LAW, IN RELATION TO ENACTING THE PACKAGING REDUCTION AND RECYCLING INFRASTRUCTURE ACT

Date: 3/10/2025

New York Farm Bureau, the state's largest agricultural advocacy organization, respectfully requests your opposition to the above-mentioned legislation. If enacted, this proposal would create an entirely new statewide recycling program and shift the responsibility from private recycling/waste management companies and municipalities to "producers" (including farms, nurseries and agribusinesses that sell dairy, wine, cider, and other packaged goods, along with the forest product industry). Farm producers are entirely unprepared to assume this type of responsibility, from both a management and financial perspective, especially given the current farm economy. We appreciate the Sponsors understanding the unique business of dairy cooperatives and providing an exemption for them. However, limiting this exemption to only cooperatives that have less than fifty employees is not realistic and concerning given most of our cooperatives operating in New York State have over two hundred fifty employees.

Additionally, there is major concern for the impact this legislation would have on food packaging when it comes to safety, structural integrity, and shelf life. Also of concern is the tremendous increase in the amount of food wasted as well as the increase in the costs of food for consumers, all at a time when many within our state do not have enough food. Dairy cooperatives in the state have already made strides in increasing the percentage of post-consumer content used for certain products, however they were only able to take this expensive leap with the help of a grant. These businesses do not have packaging engineers on staff and thus adding another costly burden. The legislation also would require farmers to be on the hook for end-of-life costs for products covered by the legislation. Farmers do not have the margins for any added and burdensome costs, as their costs of doing business continue to rise and they are often operating at a loss. Lastly, this legislation would lead to many of our farms and processing operations closing due to being simply unable to afford the new added costs.

According to the 2022 USDA Census of Agriculture, New York State has lost nearly 3,000 farms. We simply cannot bear to lose any more farms and food production in the state. If passed and signed into law,

this legislation could create very real negative impacts on farm viability, food access and cost all during a time that we are trying to encourage and strengthen food production and on-farm processing of food products.

For these reasons, the New York Farm Bureau requests your opposition to this legislation.