Flexible Packaging Association
Connecting. Advancing. Leading.

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July 20, 2026

The Honorable Gus Bilirakis, Chairman
Committee on Energy and Commerce Subcommittee on Commerce, Manufacturing, and Trade
U.S. House of Representatives
2306 Rayburn House Office Building
Washington, DC 20515

The Honorable Jan Schakowsky, Ranking Member
Committee on Energy and Commerce Subcommittee on Commerce, Manufacturing, and Trade
U.S. House of Representatives
2408 Rayburn House Office Building
Washington, DC 20515

RE: *Legislative Proposals to Strengthen Consumer Protection in a Changing Marketplace*

Dear Chairman Bilirakis and Ranking Member Schakowsky:

On behalf of the **Flexible Packaging Association (FPA)**, I am pleased to submit this Statement for the Record in support of H.R. 6832, the Packaging and Claims Knowledge (PACK) Act of 2025 (Rep. Weber) and H.R. 7502, the Recycled Materials Attribution Act (Reps. Langworthy and Gonzalez), which will be heard before the U.S. House of Representatives Committee on Energy and Subcommittee on Commerce, Manufacturing, and Trade on July 22, 2026, at the hearing titled, *"Legislative Proposals to Strengthen Consumer Protection in a Changing Marketplace."*

FPA is the voice of the U.S. manufacturers of flexible packaging and their suppliers. The association's mission is connecting, advancing, and leading the flexible packaging industry. Flexible packaging is produced from paper, plastic, film, aluminum foil, or any combination of those materials, and includes bags, pouches, labels, liners, wraps, rollstock, and other flexible products. Flexible packaging is the second largest and the fastest growing segment of the U.S. packaging industry, employing over 98,000 people in flexible packaging manufacturing facilities throughout the U.S. and representing over $51.5 billion in direct economic impact in the U.S.

Flexible packaging is used for a myriad of consumer goods, including fresh and frozen fish, meat, poultry, meals and vegetables; personal care items such as disinfecting wipes and feminine hygiene products; pet foods; and lawn and garden products. Flexible packaging is also used extensively in the medical industry to ensure that products like dental instruments, diagnostic tests, IV solutions, catheters, intubation tubes, and personal protective clothing and equipment remain sterile and effective before use.

Flexible packaging is one of the most environmentally sustainable packaging types, as it reduces water and energy consumption, improves product-to-package ratio, enhances transportation efficiency, minimizes food waste, and reduces greenhouse gas emissions. It is important to note that recycling is an iterative process, developed over time, and full circularity options for flexible packaging, at this point, are generally more limited than those for some other packaging formats and materials (i.e., glass bottles, metal cans, paper, rigid plastic containers). These products have been in the solid waste stream for much longer and have had more time to develop mature infrastructure options and solutions for collection, recovery, sortation, and end market delivery and usage.

Developing end-of-life solutions for flexible packaging is a work in progress, and there are now more than a dozen peer organizations and many more private efforts working collaboratively to advance flexible packaging recycling. **FPA** is partnering with manufacturers, recyclers, retailers, waste management companies, brand owners, and other organizations to continue making strides toward total packaging recovery. Some examples of entities with which we are collaborating include The Recycling Partnership (TRP), the Hefty® ReNew™ Program, the Flexible Film Recycling Alliance (FFRA), and the Circular Action Alliance (CAA) Plastic Film and Flexibles Taskforce. Also, increasing the recycled content in packaging and other new products will create markets for those products and can serve as a policy driver for the creation of new collection, sortation, and processing infrastructure for valuable materials to be recycled.

FPA supports H.R. 6832, the Packaging and Claims Knowledge (PACK) Act of 2025 (Rep. Weber), and H.R. 7502, the Recycled Materials Attribution Act (Reps. Langworthy and Gonzalez), because both are aligned with our deep commitment to solve packaging waste issues and increase the recyclability and recycling of flexible packaging.

H.R. 6832, Packaging and Claims Knowledge (PACK) Act of 2025

All the increased data, funding, infrastructure, processes, technology, and end markets for the recycling of flexible packaging and other materials and products are essentially for naught if consumers cannot or do not recycle in the first place. Consumers would benefit from more consistent and harmonized national requirements defining what is considered recyclable and how and where it can be recycled.

California's "truth in labeling" law enacted in 2021 (Senate Bill 343), which establishes state-specific requirements for when packaging can be labeled as recyclable will likely lead to consumer confusion and more—not less—packaging going to landfill. If this law is allowed to take full effect in October 2026, it will immediately be in conflict with up to 30 other states with different requirements for recyclability labeling. Several other states are considering their own "truth in labeling" laws, and **FPA** is opposed to these state-level efforts.

FPA supports the consideration of a federal law, such as proposed in H.R. 6832, the Packaging and Claims Knowledge (PACK) Act of 2025, that establishes federal requirements for the labeling of packaging for compostability, recyclability, and reusability, with strong oversight by the U.S. Federal Trade Commission (FTC), which already maintains jurisdiction over guidance for product marketing claims through its Guides for the Use of Environmental Marketing Claims ("Green Guides"). We believe this approach, which will also support existing voluntary national labeling programs such as How2Recycle and the Biodegradable Products Institute (BPI) certification program for compostable labeling, makes far greater sense than a state-by-state approach. It will reduce misleading packaging claims and lead to more consumers properly handling flexible packaging at its end of life.

Businesses also need clear and consistent requirements when products are sold across state lines. Today, differing state standards are creating confusion and forcing FPA member companies and their customers to consider implementing and managing separate labeling, packaging, inventory, and compliance requirements for the same products. That is and extremely costly and unreasonable endeavor.

By reducing consumer confusion and enabling informed choices, we believe the PACK Act will promote proper management of packaging materials at their end-of-life, diverting them from landfills and advancing a circular economy. We applaud the efforts of Representative Randy Weber who has led the charge on this important legislation and we believe it is critical to ensure consumers have accurate information and provide companies such as **FPA** members with the framework they need to innovate and invest in circular and sustainable packaging.

H.R. 7502, Recycled Materials Attribution Act

There is a strong desire and need for flexible packaging converters (manufacturers) and brand owners to use more recycled content in their packaging products, whether to meet stated company or organizational (e.g., Ellen MacArthur Foundation Global Commitment) sustainability goals or to meet emerging state extended producer responsibility (EPR) or recycled content requirements for packaging. **FPA** supports its members in increasing recycled content in their packaging products, but not through unachievable or unreasonable government requirements that treat all packaging the same and therefore do not recognize certain unique attributes or needs of some flexible packaging (i.e., for food and medical) that may require limiting the use of recycled content.

We therefore support a uniform national standard for validating recycled content claims as proposed in H.R. 7502, the Recycled Materials Attribution Act (RMAA). Today, flexible packaging manufacturers and brand owners must navigate a patchwork of state regulations, each with its own definitions and restrictions governing recycled content claims. Since flexible packaging products travel through national supply chains, these inconsistencies raise compliance costs and

create confusion in the marketplace. The RMAA will establish a clear federal framework, direct the FTC to update its Green Guides, and provide the regulatory certainty needed to foster stronger end-markets for recycled materials.

FPA also supports advanced recycling—sometimes referred to as chemical or molecular recycling – as necessary to increase the use of recycled content in some films and flexible packaging. Stringent quality standards enforced by the U.S. Food and Drug Administration (FDA) require additional washing and processing for mechanically recycled films to ensure no chemical migration, odor, or color is transferred. This restricts the use of recycled content in some product packaging (i.e., cosmetics, food, and medically sterilized devices), and obtaining FDA approvals for the use of mechanically recycled content for packaging for these types of products is often arduous and slow. Advanced recycling eliminates some of this lag because the technology returns plastics to a monomer, eliminating concerns of chemical migration, odor, or color.

The RMAA's recognition of advanced recycling technologies and mass-balance accounting is particularly important for flexible packaging. Technical films for food, produce, and medical applications require high material purity and performance, which mechanical recycling often cannot deliver at scale. Advanced chemical recycling breaks down complex plastics to their basic building blocks, allowing them to be remade into high-quality resins. By permitting third-party verified mass-balance accounting, the RMAA enables manufacturers to trace recycled feedstocks through supply chains without expensive physical separation, supporting these critical applications.

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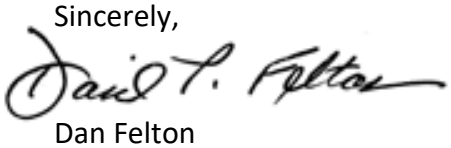
In conclusion, the PACK Act and the RMAA both support progress toward a more circular economy for flexible packaging. The PACK Act will make end-of-life labeling more consistent for consumers, while the RMAA will standardize the verification of recycled-content claims nationwide. We applaud the Subcommittee for holding this important hearing and encourage the Committee to swiftly advance both bills to provide certainty, expand recycling capacity, and strengthen sustainable packaging solutions nationwide. Please don't hesitate to contact me at (410) 694-0825 or dfelton@flexpack.org if I may be of further assistance.

Sincerely,



Dan Felton
President & CEO
Flexible Packaging Association (FPA)