



June 17, 2026

The Honorable Randy Weber  
Member, U.S. House of Representatives  
107 Cannon House Office Building  
Washington, DC 20515

**RE: H.R. 6832 – Packaging and Claims Knowledge Act of 2025 (PACK Act) —  
OPPOSE**

Dear Representative Weber,

On behalf of the Rural County Representatives of California (RCRC), California State Association of Counties (CSAC), League of California Cities (Cal Cities), California Compost Coalition (CCC), Community Alliance with Family Farmers (CAFF), Californians Against Waste (CAW), and the National Stewardship Action Council (NSAC), we must regretfully oppose your H.R. 6832, also known as the Packaging Claims and Knowledge Act of 2025 (PACK Act). While we support your overarching goals of helping consumers correctly identify recyclable and compostable materials, we regret that it will instead increase consumer confusion of what is truly recyclable or compostable in their communities and significantly increase recycling and composting costs for local governments, the solid waste industry, and consumers.

H.R. 6832 seeks to establish common national definitions for the terms “recyclable” and “compostable” and preempt any different definitions adopted at the state or local level. Unfortunately, those terms fail to recognize real-world operating conditions. This measure undermines existing efforts to ensure that materials introduced into the stream of commerce are actually, and not just theoretically, recyclable or compostable. By barring states from adopting measures to ensure that the products sold in their jurisdictions can actually be

handled by their recyclers and composters, we fear that H.R. 6832 will increase costs and challenges for states and local governments to manage the solid waste stream.

In California, local governments are the backbone of solid waste management and recycling efforts, with the State Legislature declaring that “solid waste management is a shared responsibility between the state and local governments.”<sup>1</sup> California local governments are also charged with diverting 50 percent of solid waste from landfill disposal through source reduction, recycling, and composting.

To achieve these objectives, California has adopted a wide-ranging program that builds upon substantial private and ratepayer investments with:

- A statewide market development program
- A sales and use tax exclusion for projects that utilize recycled feedstock
- Producer responsibility programs for the collection and recycling of paint, carpet, mattresses, mercury thermostats, pharmaceuticals and sharps, textiles, batteries, and pesticide containers
- A deposit program for beverage containers
- Minimum recycled content requirements for rigid plastic packaging and plastic beverage containers
- Requirements for producers to ensure that the single-use packaging they introduce into the stream of commerce is either recyclable or compostable
- Tailored definitions for what can be labeled as “recyclable” or “compostable” to ensure those items can be handled in the existing solid waste recycling and composting systems

Public agencies and the solid waste industry have no control over products introduced into the marketplace, for which they will ultimately be responsible for managing, disposing, composting, or recycling. As such, it is vital that manufacturers design products that are readily recyclable (not just theoretically recyclable) and for which there are end markets. Despite the substantial financial investments and programmatic changes described above, there remain significant challenges to recycling - particularly the lack of reliable end markets for those materials.

Any national standard for recyclability and compostability claims must be grounded in the presence, availability, and accessibility of end markets for those recyclable materials. In the absence of end markets, recyclable and compostable claims will be misleading to consumers, force the solid waste industry (and residents) to pay more to screen out materials for which there is no end market, and simply result in the creation of more expensive trash.

As we previously noted in comments on a proposed National Recycling Strategy, a well-structured national framework “could have a transformative effect on local and state recycling efforts and significantly reduce solid waste management costs... National efforts

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<sup>1</sup> CA Public Resources Code Section 40001.

should focus first and foremost on increasing manufacturer engagement in designing readily recyclable products and using recycled materials in those products.”

Beyond recycling, the PACK Act will have a particularly harmful impact on local composting efforts in California. To label something as “compostable”, H.R. 6832 merely requires those products to meet ASTM industrial compostability standards and for municipal or industrial composting facilities to be available where the item is sold. This poses both technical and economic challenges for local governments, the solid waste industry, and residents.

California’s packaging labeling requirements were designed to reflect infrastructure realities and end-market considerations. Mere compliance with existing industrial composting standards, as envisioned in H.R. 6832, is neither economically adequate nor technologically feasible. From the technological perspective, existing industrial composting standards do not align with California composting practices or realities. For example, the ASTM D6400 certification standard for compostable plastics requires 90% biodegradation of compostable plastics within 180 days. In California, most composting facilities operate on 45-90 day cycles – far shorter than the 180 days contemplated for 90% biodegradation in ASTM D6400. This means that compostable plastics that meet ASTM standards will not fully break down in California’s composting facilities, thereby requiring both private and public facilities to substantially change existing operations to accommodate emerging products - at extraordinary cost.

While California’s SB 343 of 2021 ties recyclability claims to real-world collection and processing rates, AB 1201 of 2021 establishes standards for what can be labeled compostable in California. AB 1201 requires products labeled as “compostable” to comply with USDA National Organic Program (NOP) standards for allowable compost feedstocks and be free of persistent contaminants like PFAS. This standard is vital to ensure that the compost produced in California facilities is marketable, as roughly 2/3 of compost produced in California is sold to agricultural end markets that demand compliance with USDA NOP standards. Compostable plastics do not meet the USDA NOP standard, and so must be screened out as contaminants to preserve access to agricultural markets. Given the importance of these markets, contamination is a serious concern for California’s public and private composting facilities. Unfortunately, H.R. 6832’s preemption language will invalidate both of these important laws. In doing so, H.R. 6832 will undermine important efforts to improve and reduce the costs of local composting and recycling programs. As such, H.R. 6832 will remove incentives for manufacturers to design products that can actually be recycled or composted in existing facilities and markets.

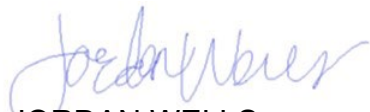
For the above reasons, we must respectfully oppose H.R. 6832. We strongly suggest removal of Section 27(c)(3), which preempts states and local governments from establishing packaging labeling laws that are different than the federal standard included in this measure. Federal laws should establish regulatory floors, not ceilings, to ensure that states can continue to serve as “laboratories of democracy” and have the freedom necessary to experiment with a variety of approaches to public issues. Please do not hesitate to contact us with any questions.

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Sincerely,



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