

Advocates of the
Food Industry
Since 1900



FOOD INDUSTRY ALLIANCE OF NEW YORK, INC.

111 Washington Avenue - Suite 200, Albany, NY 12210 (518) 434-1900

Attention of: The New York State Senate and Assembly Environmental Conservation Committees

Dear Chairpersons Kaminsky and Englebright,

The Food Industry Alliance of New York State Inc., the premier trade association representing the full spectrum of the grocery industry, submits this testimony on behalf of our large membership across New York. We applaud this hearing that will allow the many stakeholders, including those in the business community to put forward their concerns about the potential impacts of recycling regulations in our state. The primary concern for FIANY currently is in relation to any proposal to expand the Bottle Bill in New York. While the retail food industry certainly appreciates the intent to increase recycling of bottles, we have significant concerns with expanding the Bottle Bill. This expansion would add to the already high cost of doing business in the New York state, and put an additional burden on the grocery industry.

Firstly, from a space perspective alone, this proposal would be difficult to comply with. Many food retailers do not have the space to handle increased volume. In fact, there are stores that barely have the space to handle what they are currently required to process. This will overwhelm already stressed supermarket storage areas. Moreover, it must be considered that many retail food stores are already forced to redeem large volumes of containers from individuals who are not customers – an issue which again would only be exacerbated with the proposed expansion.

Another overarching concern that is shared by many industries is the inability for our current redemption infrastructure to handle the kinds containers that would now be subject to deposits. The consequence of this is that our members would have to go back to the days of accepting these additional bottles by hand – this is hugely burdensome and a disaster for compliance.

For example, many of our larger supermarket members rely principally on Reverse Vending Machines (RVMs). These machines are not manufactured to accept some of the plastic bottle and steel cans that would be included in this legislation. That means that the process of redemption would not only be more time consuming for the customer, but again would add a significant financial burden to our stores.

The grocery industry operates within finite profit margins. From the potential need to purchase additional reverse vending machines to expanding or creating new space – these costs would be untenable for many of our members. The full picture must consider increases in labor, sanitation and recordkeeping.

There are countless examples of the retail food industry as business leader in promoting healthy living, a cleaner environment and community investor. This industry is essential in every community across the state. Yet the fact remains that they are in a financially volatile situation with the annual increases in every aspect of running their stores. Imposing new costs or mandates will further threaten the industry's ability to invest, expand and serve their communities.

We know that a significant fraction of these bottles are already being recycled in local programs. We strongly support leaving the containers in that system, where they provide value to recyclers, and leaving them out of the deposit system.

We appreciate your consideration of our concerns on this issue.

Respectfully submitted,

Food Industry Alliance of New York State, Inc .

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