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Thank you for the opportunity to provide testimony relative to the Extended Producers Responsibility section in Governor Hochul's proposed FY2022-2023 Executive Budget - Environmental Conservation Hearing February 1, 2022.

Frontenac Point Vineyard - Estate Winery was licensed NY Farm Winery #44 in 1982. There are now more than 480 wineries. In 1979 we left positions in NYS government in Albany, purchased land in Seneca County, planted a vineyard and released our first vintage in 1983. We now operate our winery with our son, Lawrence, who will over - second generation.

We and hundreds of other wineries in New York were able to start a farm winery and rural business thanks to the Two-Page Farm Winery Governor's Program Bill that Governor Carey signed into law in 1976. That law greatly expanded the economies of rural NY in the entire state.

We support EPR legislation that rewards reduced use of materials and re-use/recycling of what we do use. However, today we face multi-page EPR legislation in the Governor's Budget Bill that is full of jargon and confusing legalese. We don't know what it will cost nor how we will have to work with a PRO. Only penalties for non-compliance are clear and costly. It expands the NYS bureaucracy requiring producers of food and beverages to register with the DEC and pay another fee for that.

As written, this legislation will cause regression in rural economies. And it will not "Save taxpayers money since they will no longer have to pay for recycling." Closed businesses in rural New York decreases competition and that adversely affects consumers.

The accounting requirements and cost of these new programs will be substantial to producers so those should be specified in advance of passage of the EPR legislation in the Budget Bill. Producers should have their concerns incorporated into the legislation before it is The Law.

The needs assessment study stated in the Budget should occur before this is passed.

An allowance for consumer responsibility must be included in the legislation. The success of this depends on all involved adhering to rules that are set. Recycling programs will continue to fail if consumers throw recyclables in their trash.

Thank you,
Jim, Carol and Lawrence Doolittle