



EPR Section in the Executive Budget Bill proposal for FY 2022-2013

The Honorable Liz Krueger and The Honorable Helene Weinstein

My name is Scott Osborn and along with my wife Ruth we own Fox Run Vineyards on the west side of Seneca Lake. I am writing about several concerns that I have with the referenced EPR legislation.

This legislation would have a direct effect on all New Yorkers and not just on producers. One of the things not mentioned in the legislation is consumer responsibility and the consumer should be responsible also. The success of the program will depend on consumers adhering to the rules. Germany currently requires its citizens to presort 6 different types of recyclables. We are all in this together and you can't put responsibility on the producer alone when the consumer is not participating.

The next area of concern is the needs assessment study that is discussed in the budget plan. This process should occur before legislation is passed not after. It is not right to pass a law and have no idea what the cost to is going to be. That should be spelled out in the legislation. I currently have no idea what my costs will be under this new law. Why not convene a statewide commission to study the needs and costs with greater participation of stakeholders and citizens? A great amount of detail is provided on penalties for noncompliance but no details on actual costs to producers.

The reporting and accounting requirements are onerous. I refer to the report that we would be required to post in our website each year as one example. (Pg 189) Please take the time to read over the myriad of details we would have submit in this report.

It appears that this law will create two new bureaucracies. One will be the PRO organizations and then a new bureaucracy within DEC to manage the PROs. The accounting and cost of these new programs will be substantial. Again it would make sense to cost these out in advance of passage of the legislation.

While I support EPR legislation, I have many reservations on how it is being rushed forward without the input of expert opinion and wider stakeholder input. There are just too many unanswered questions and it's a huge new program. Let's do our homework and get it right.

We sincerely hope you will consider this request.

Sincerely,

Scott Osborn  
President and Co-Owner  
315-536-4616  
scott.osborn@foxrunvineyards.com