



IDFA
International
Dairy Foods Association

February 3, 2026

Senator Pete Harckham
Chairman
Committee on Environmental Conservation
198 State Street, Legislative Office Bldg
Room 310
Albany, NY 12210

Senator Daniel Stec
Ranking Member
Committee on Environmental Conservation
188 State Street Legislative Office Building,
Room 408
Albany, NY 12247

Re: New York State Senate Bill S.420

We write to express our opposition to S. 420, legislation pertaining to product and packaging label claims related to recycling, that would establish a framework for when a recycling claim can be included on food packaging without making a deceptive and misleading claim. While we share the goal of providing consumers with accurate information and improving recycling outcomes, we believe this bill would further exacerbate the challenges faced by dairy food companies complying with a patchwork of state recycling label laws, reduce recycling and infrastructure investment necessary to develop a circular economy, and add new labeling costs to companies manufacturing nutritious dairy products in New York for distribution across the nation.

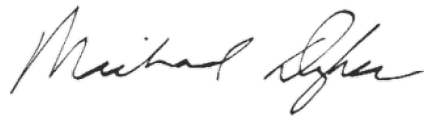
The dairy industry has always been an economic driver in New York, delivering more than \$17 billion in [direct economic impact](#) and providing more than 61,000 direct jobs that pay more than \$3.4 billion in wages. New York is the largest state recipient of recent dairy processing investment nationwide, with approximately \$2.8 billion committed to projects in New York to meet the rising demand for wholesome and nutritious dairy products around the world, making this bill an acute and immediate concern for future viability.

Dairy products manufactured in New York are distributed and sold throughout the United States and exported globally. As a result, we strongly support a national uniform approach to recycling labeling. Currently, [29](#) states require a “chasing arrow” symbol on plastic packaging. S.420 would further add to this labeling complexity and patchwork of state recycling labeling laws, making it increasingly complicated and costly for New York companies to conduct business in other states. It is costly, if not logistically impossible, to generate different recycling labels to comply with the unique labeling requirements in different states. Moreover, the timeline provided in S. 420 to amend labels after publication of the list of recyclable materials and formats is inadequate because label changes can require up to 18 months of lead time to develop, source materials for, and implement across businesses.

Although S.420 requires implementing regulations, we are concerned that the bill explicitly ties a recycling label to mechanical and manual recycling, foreclosing the ability to use advanced recycling technologies for hard-to-recycle resins. Our industry uses many different materials, from coated paper, multilayer materials, glass, ceramics, wax, rigid plastics and flexible plastics. Some materials essential for food quality and safety, such as flexible films for cheese, are generally not recyclable through mechanical or manual sortation in New York. A bill that prevents the use of a recycling label in the future for hard-to-recycle materials forecloses investment and innovation to reclaim those materials for use in new products, which is our collective goal as an industry.

We urge you to reconsider this approach. The Federal Trade Commission's Green Guides provides states with well-established guidance to prevent deceptive or misleading recycling claims and promote consistent consumer understanding. The Green Guides are currently under review and offer a more effective pathway to improve recycling outcomes without undermining food safety, affordability, or continued investment in New York.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael Dykes".

Michael Dykes, DVM
President and CEO
International Dairy Foods Association

Organization and Business Co-Signers

Agri-Mark, Inc./Cabot
BelGioioso Cheese, Inc.
Byrne Dairy, Inc.
Dairy Farmers of America
Danone US
HP Hood LLC
Leprino Foods Company
New York State Cheese Manufacturers' Association
Northeast Dairy Foods Association
Perry's Ice Cream
Saputo Inc.
Wells Enterprises, Inc.

CC: Members of the New York Senate Environmental Conservation Committee