

May 7, 2025

The Honorable V. Susan Sosnowski
Chair, Senate Environment and Agriculture Committee
Rhode Island State House
Providence, RI 02903

RE: Senate Bills 996 (McKenney) – Support – Coalition for High Performance Recycling

Dear Chair Sosnowski, Vice Chair Britto, and Committee Members:

We appreciate the opportunity to submit testimony strongly supporting S 996, a bill that would make Rhode Island a leader globally in high performance recycling systems by implementing two proven policies—extended producer responsibility (EPR) for packaging and printed paper and a bottle bill for beverage containers. The Coalition for High Performance Recycling¹ (CHPR) represents a unique alliance of environmental nonprofits, material manufacturers, packaging suppliers, trade associations, and beverage companies, including beverage brands such as Diageo (owns Guinness and Smirnoff among others), New Belgium Brewing, Niagara, Primo Brands (owns Crystal Springs and Poland Spring among others), Red Bull, and Suntory Global Spirits (owns Jim Beam and Maker’s Mark among others). We have a substantial presence both nationally and internationally, with our products and packaging composing many of the items that Rhode Islanders sell, buy, and enjoy. We believe that reducing litter and achieving efficient recycling can only occur through a system combining EPR with a modern bottle bill, also known as a Deposit Return System (DRS) or recycling refund.

Proven Approaches that Deliver Dramatic Improvement

Implementing S 996 would mean dramatic improvement from Rhode Island’s current 26 percent recycling rate.² This is because by doing both EPR and a bottle bill together, both household recycling and the one-third of beverage containers consumed on the go are addressed. With EPR, more households have recycling, education to residents is increased, and the cost is shifted to producers (i.e., mostly brands) such that municipalities save money and producers are incentivized to put more recyclable packaging into the marketplace. With a bottle bill, it creates financial motivation for people to recycle beverage containers no matter

¹ <https://chprecycling.org/>

² <https://recyclingpartnership.org/residential-recycling-report/>

where they are, resulting in significant litter reduction. In short, with both, more material is recycled and more problems are solved for Rhode Islanders.

Rhode Island's recycling rate will increase because governments around the world that have implemented both programs have seen results. Over 60 countries today have some form of EPR for packaging³ with many achieving much higher recycling rates than Rhode Island's current rate.⁴ These results are part of why five states have signed EPR into law and another two are awaiting the governor's signature on an EPR for packaging bill. The bottle bill is similarly widespread with even better results. It is projected that by the end of 2027, more than 70 jurisdictions—covering approximately 641 million people—will have operational bottle programs for beverage containers.⁵ Many of these countries, particularly the ones with a recycling refund value of ten cents or more, consistently achieve annual redemption rates above 90%.⁶ The United States has ten states with a bottle bill, all of them for two decades or more and most in place for more than 40 years. Today, there is 90 percent support among those living in states with a bottle bill.⁷ Further, the data shows significantly higher recycling rates for beverage containers sold with a deposit in those states versus beverage containers sold without a deposit across the country.⁸

These results have driven most governments around the world to adopt both EPR and a bottle bill rather than one or the other. According to Container Recycling Institute, 51 places have both, 27 have DRS-only, and 18 have EPR-only.

Doing Both Solves More Problems

EPR solves problems for Rhode Island. They include—

- Stopping taxpayers from paying for an underperforming system. Today, 27 Rhode Island municipalities pay \$15.6 million per year to collect recyclables.⁹ Municipalities also pay a penalty plus landfill tipping fees for all recyclables rejected by Rhode Island's only

³ <https://packagingschool.com/lessons/extended-producer-responsibility-laws-for-packaging-around-the-world>

⁴ <https://recyclingpartnership.org/eprreport/>

⁵ <https://www.reloopplatform.org/resources/global-deposit-book-2024/>

⁶ <https://www.reloopplatform.org/resources/global-deposit-book-2024/>

⁷ <https://www.cancentral.com/survey-finds-overwhelming-bipartisan-support-for-recycling-refund-programs/>

⁸ <https://www.container-recycling.org/index.php/u-s-nominal-recycling-rates-by-deposit-status-2019>

⁹ <https://rirrc.org/sites/default/files/2022-05/Final%20Report%20Organics%20Collection%20Alternatives%20March%202022%20to%20RIRRC.pdf#page=15>

material recovery facility (MRF), which sorts recyclables for sale. Many recyclables are rejected with Providence leading the way at 648 pounds of recyclables rejected per household in 2024 at a cost of \$1.14 million.¹⁰ With the EPR program created under S 996, the producer responsibility organization funded by producers would pay for collecting recyclables and for any rejected recyclables.

- Stopping the lack of spending on education. Municipalities rely on recycling education grants from Rhode Island Resource Recovery Corporation (RIRRC). In FY 2025, only \$100,000 of grants were available.¹¹ The EPR program in this bill would have the producer responsibility organization (PRO) paying for education and outreach and other activities to reach the performance targets.
- Stopping so many recyclables from unnecessarily filling up Rhode Island's only landfill, which is set to reach capacity by 2046.¹² Less recyclables will go to the landfill given the performance targets in S 996 on collection rate and recycling rate as well as the fee structure that incentivizes producers to use more recyclable packaging.

Importantly, EPR does not solve the pressing problem of litter. That means the widespread concern among Rhode Island voters about litter and waste on Rhode Island shorelines and in the ocean (85%), with 65% saying it is of "great concern" to them, would not be addressed. More specifically on litter and other areas, the bottle bill solves the following problems—

- Stopping beverage containers from littering Rhode Island roadways, shorelines, and waterways. The Keep America Beautiful National Litter Study found there was substantially more deposit material litter per capita in non-bottle bill states than in bottle bill states, by a difference of a two-to-one ratio.¹³ This reduction in litter saves taxpayer dollars. The Rhode Island Department of Transportation spends \$800,000 annually on litter cleanup along roadways,¹⁴ and municipalities could spend less on street sweeping.¹⁵ It also has public health benefits. A DSM study found the value of these public health benefits for Rhode Island from instituting a bottle bill would be \$3.2

¹⁰ <https://turnto10.com/i-team/on-your-dime/contaminated-recycling-taxpayer-cost-rhode-island-resource-recovery-rirrc-central-landfill-east-providence-warwick-coventry-smithfield-johnston-march-31-2025>

¹¹ <https://rirc.org/municipal-officials-haulers/municipal-officials/grant-program>

¹² <https://rirc.org/about/operations/central-landfill-for-trash>

¹³ https://kab.org/wp-content/uploads/2021/05/Litter-Study-Summary-Report-May-2021_final_05172021.pdf

¹⁴ <https://litterfree.ri.gov/success-stories/state-partners/ridot-clean-rhodes-program>

¹⁵ <https://www.reloopplatform.org/resources/deposit-return-systems-generate-cost-savings-for-municipalities/>

million per year.¹⁶ Further, for the Ocean State that prides itself on its oceans and increasingly depends on tourism, less litter is important to its residents and visitors.

- Stopping contaminated beverage containers from not being recycled into new containers. Many of CHPR's members buy, manufacture, or supply to manufacturers of beverage containers. A bottle bill will deliver higher volumes and, importantly, higher quality material that is easier to turn into new containers. That means domestic manufacturers have domestic supply chains that are more resilient, and Rhode Islanders can purchase beverage containers with higher recycled content, which have a lower carbon footprint.
- Stopping so many beverage containers from going to the landfill. A bottle bill would mean 10,000 less tons of beverage containers going to landfill versus today.¹⁷ This helps address the concern of 73 percent of Rhode Island voters about the landfill nearing capacity.¹⁸

Doing both EPR and a bottle bill together solves all of the above problems. Doing one or the other means not fully addressing Rhode Island's recycling problem or the concerns of Rhode Islanders.

S 996 is Well-Designed EPR and Bottle Bill

S 996 would implement a well-designed EPR for packaging program and a well-designed bottle bill that would complement each other in terms of the problems they solve and their timing.

There are several components of the EPR program that CHPR applauds--

- **Needs Assessment.** S 996 wisely chooses to start with a needs assessment that then informs the Packaging Producer Responsibility Organization's program plan. This means the PRO, advisory council, and Rhode Island Department of Environmental Management are fulfilling their obligations with a thorough understanding of the current state of Rhode Island's recycling system.

¹⁶ <https://rirrc.org/sites/default/files/2017-02/Beverage%20Container%20Redemption%20System%20Study%202008.pdf>

¹⁷ <https://ecori.org/new-bottle-bill-lands-in-house-would-add-10-cent-deposit-on-beverage-containers-including-nips/>

¹⁸ <https://savebay.org/new-poll-shows-majority-of-rhode-islanders-support-a-bottle-bill-to-reduce-litter-and-improve-recycling/>

- **Program Plan.** This plan forces the PRO to determine exactly how it will meet the requirements in the bill and those set later by the Rhode Island Department of Environmental Management.
- **Fees.** The fee structure is fair such that each material pays its own way and also there is ecomodulation of fees such that there are incentives to reduce environmental impacts.

CHPR also appreciates the following bottle bill program components--

- **Convenience Standard.** The convenience standard rightly provides flexibility to the Recycling Refund PRO on where it will locate redemption sites while also giving Rhode Island Department of Environmental Management oversight to ensure all Rhode Islanders can conveniently redeem their beverage containers. This convenient redemption is important to ensuring Rhode Islanders have a good experience with the program and further reinforces how the deposit is not a tax. The deposit is a refundable fee that, with the convenience standard in place, a person would be choosing not to redeem in spite of the ease of doing so.
- **Refund Value.** The ten-cent refund value aligns with the findings from bottle bills around the world that at least a ten-cent deposit is key to motivating redemption. S 996 also smartly includes a mechanism for Rhode Island Department of Environmental Management to increase the deposit since part of what has kept performance in existing deposit states from being as high as it could be is that the five-cent deposit has remained unchanged for decades even with inflation significantly reducing that financial incentive to redeem.
- **Retailer Optionality.** No Rhode Island retailer has to be concerned about hosting redemption mechanisms since there is no requirement in S 996 for them to do so. In fact, S 996 requires the Recycling Refund PRO to develop incentives for retailers to opt-in to hosting redemption mechanisms. These incentives could include paying rent for the space taken up as well as allowing retailers that host redemption mechanisms to have credit at their stores be a refund option. Also, Rhode Island's recycling refund system will utilize reverse vending machines, bag drop, and other modern redemption mechanisms that enable redemption in seconds and can be outside stores.

More generally, S 996 has a thoughtful set of timelines where the Recycling Refund PRO acts first followed by the Packaging PRO. This is because the Recycling Refund PRO with its focus on just beverage containers rather than all packaging is able to move more quickly. The bill also helpfully spaces out the deadlines so Rhode Island Department of Environmental Management

is better able to manage its oversight responsibilities. The bill strikes a good balance between ambitious and realistic in its deadlines.

In addition, S 996 requires the PROs to pay for whatever oversight, administrative, and enforcement costs that Rhode Island Department of Environmental Management incurs due to this bill, ensuring that Rhode Island does not have to increase taxes to pay for EPR or the bottle bill and the many positive results the two will provide.

Conclusion

CHPR encourages this committee to pass S 996 for consideration by the full Senate as it will benefit industry, the environment, local and state government, and all Rhode Islanders.

Thank you for your consideration,

Coalition for High Performance Recycling

CHPR MEMBERS

CHPR is proud to be supported by leading brands, companies, nonprofits, and organizations committed to advancing high-performance recycling, including:

Washington Wine Institute
Tri-Arrows Aluminum
TOMRA
The Recycling Partnership
The Association of Plastic Recyclers
The Aluminum Association
Suntory Global Spirits
Reloop Platform
Red Bull North America
Primo Brands
Novelis
Niagara Bottling
New Belgium Brewing Company
International Bottled Water Association
Indorama Ventures North America
Glass Packaging Institute
Diageo North America

Constellium N.V.

CLYNK

Can Manufacturers Institute

Ball Corporation

Arconic Corporation