

February 26, 2025

The Honorable David A. Bennett House Committee on Environment and Natural Resources Rhode Island State House, Providence, Rhode Island 02903

RE: H 5293 – Textile Reporting and Recycling Education Legislation – NEUTRAL

Dear Chairman Bennett and Members of the Committee,

I am writing on behalf of the <u>Secondary Materials and Recycled Textiles Association (SMART)</u> to provide feedback on HB 5293. This legislation requires private entities involved in textile collection to provide annual reporting on the estimated total tonnage of textiles collected and tasks the Rhode Island Department of Environmental Management and Rhode Island Resources Recovery Corporation create a public education outreach program to educate residential households and commercial businesses on textile recycling in the state.

SMART is a non-profit trade association founded in 1932 that represents numerous small and medium-sized companies involved in using, converting, and recycling pre- and post-consumer textiles and other secondary materials. Our members' activities are very diverse.

Some SMART members recover and process "pre-consumer" by-products from the textile and fiber industries to be used in new materials for automobiles, home furnishings, and a variety of other products. Others buy and sell "post-consumer" second hand textiles, purchasing excess textile donations collected from various charities and commercial sources (e.g., Salvation Army, Goodwill, hospitals, hotels, industrial laundries, etc.). Some collect used textiles dropped off by the public via clothing collection bins conveniently located throughout communities. Some of these recovered textiles become wiping and polishing cloths used in institutional and industrial settings while others are reprocessed into fibers for furniture stuffing, upholstery, insulation, building and other materials. The items that can be reused as apparel is often sold in thrift stores throughout America or exported, typically to least developed and developing countries where demand for affordable, quality clothing is especially high. While recycled fiber is a useful by-product of the textile recycling trade, it is generally the resale of good, usable textiles that renders the overall industry profitable. Reuse also reduces demand for new production and prevents premature waste, making it the most sustainable choice.

Through these business activities, for-profit textile recyclers create meaningful employment for tens of thousands of people who drive local economies and generate much-needed tax revenue

across the United States. Because this industry is global, it also creates hundreds of thousands of jobs throughout the world. SMART industry members also generate meaningful income for numerous well-respected charities and make vital contributions to state and national environmental goals through the recycling of nearly 4 billion pounds of used clothing and other textile waste that would have otherwise gone to a landfill each year.

SMART is the leading industry voice promoting high standards and best practices for reuse and recycling of textiles and related secondary materials. We are continuously working to educate the public and local government officials about the importance of increasing clothing and textile reuse and recycling. Clothing and household textiles currently make up 6.3% of the waste stream or the equivalent of 81 pounds per person thrown away annually in the US. Nearly 95% of used clothing and textiles can be reused and recycled. Moreover, according to the United States Environmental Protection Agency (EPA), current clothing and textile recycling has a greater impact on reducing greenhouse gases than the recycling of yard waste, glass, and plastic.

We commend the co-sponsors' initiative to address these challenges and we support the overarching goals of H 5293, particularly in improving data collection on textile waste and increasing public awareness of the importance of textile diversion efforts. Transparency in textile waste collection is beneficial in guiding effective waste management strategies, and we have no objections to the reporting requirements proposed in the legislation.

Given our commitment to educating the public on the importance of textile reuse and recycling, we strongly support government initiatives to develop public outreach programs that raise awareness of these critical efforts and empower individuals to be part of the solution. However, we urge that any education campaign resulting from this legislation place equal, if not greater, emphasis on reuse alongside recycling. Rhode Island's waste management hierarchy prioritizes reuse over recycling due to its superior environmental and economic benefits. Extending the lifespan of textiles through reuse reduces waste generation, minimizes the demand for virgin resources, and supports local and global markets that depend on secondhand clothing and textile products. We encourage the committee to ensure that reuse is a central focus of any educational materials or outreach efforts developed under this bill.

Additionally, we seek clarification regarding the bill's language suggesting that the Rhode Island Department of Environmental Management will develop textile recycling regulations. The scope and intent of these regulations remain unclear, and we request further details on their potential impact. Should these regulations move toward an extended producer responsibility (EPR) framework or other policy measures with significant industry implications, we strongly urge that any regulatory developments be preceded by meaningful legislative consideration and robust stakeholder engagement. A transparent and collaborative approach is essential to crafting policies that are both effective and practical for all stakeholders.

SMART looks forward to continued dialogue with Rhode Island policymakers and stakeholders to ensure that textile waste management initiatives are sustainable, equitable, and aligned with best practices. We appreciate the committee's attention to this important issue and stand ready to support efforts that advance responsible textile reuse and recycling.

On behalf of SMART, I want to thank you for the opportunity to provide preliminary feedback on this important piece of legislation. If you have any questions or need additional information, I can be reached directly at (240) 332-8803 or <a href="mailto:sdecourcey@msp-amc.com">sdecourcey@msp-amc.com</a>.

Sincerely,

Susan De Courcey

Susan DeCourcey

**Executive Director** 

**Secondary Materials and Recycled Textiles Assoc. (SMART)** 

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<sup>&</sup>lt;sup>i</sup> U.S. Environmental Protection Agency Report: Advancing Sustainable Materials Management – 2014 Tables and Figures, Table 1, p. 1 (December 2016)

ii U.S. Environmental Protection Agency Report: Advancing Sustainable Materials Management – 2014 Fact Sheet, Table 5, p. 15 (November 2016)