

March 10, 2025

House Committee on Environment and Natural Resources Committee
State House
Providence, RI 02930

SUBJECT: HB 5166 – High Heat Waste Facility Act - **OPPOSE**

Dear Chair Bennett and Esteemed Members of the Committee:

The Plastics Industry Association (PLASTICS) is the only national trade association that supports and represents the entirety of the plastics supply chain, representing nearly one million workers across the United States. Since 1937, PLASTICS has been working to make its members and the industry more globally competitive while advocating for an increase in recycling and sustainability. Thus, PLASTICS has a specific interest in advanced recycling technologies and opposes HB 5166 which would prohibit advanced recycling facilities and their technologies from being built and utilized in Rhode Island. To elaborate, please consider the following:

1. **PLASTICS strongly supports efforts to ensure that greater amounts of our post-use packaging materials, especially plastics, are recycled and converted into feedstock for new plastics and other useful products.**

Plastic materials are highly valuable materials that play an important role in the modern economy. They provide sustainability benefits versus alternative materials and will continue to play an important role in helping society mitigate greenhouse gas emissions.¹ Advanced recycling is a necessary and essential complement to mechanical and organic recycling technologies in order to improve the recycling rate, reduce plastic waste, and increase the amount of recycled plastic in commerce.

2. **Advanced recycling technologies are critical to meeting plastic recycling and recycled content demands.**

As the economy becomes more circular, there is growing demand to increase plastic recycling as well as recycled content in products, and advanced recycling is critical to meeting this demand. Advanced recycling technologies can reduce environmental impacts associated with use of virgin natural resources—that is, raw material extraction, refining, and consumption—by producing fully circular outputs (polymers, monomers, intermediates, and other materials).²

3. **Advanced recycling is NOT incineration.**

¹ A recent study published by PLASTICS determined that “scientific life cycle assessments of plastics and alternative materials find that plastics tend to have lower carbon footprints, making them the more sustainable option among current materials in a number of applications.” See Green, Kenneth, Plastics and Sustainability (Oct. 2021), p.2, available at <https://2z2uy32ofddf3z9ep91ninb4-wpengine.netdna-ssl.com/wp-content/uploads/Plastics-and-Sustainability.pdf>.

² See Am. Plastic Makers, What is Advanced Recycling, available at <https://www.plasticmakers.org/advanced-recycling/> (noting that through advanced recycling, “[u]sed plastic products become new products again, keeping plastics out of our environment and reducing our need for virgin resources”).

Advanced recycling converts post-use plastics into their original building blocks, specialty polymers, feedstocks for new plastics, waxes and other valuable products. These processes take place in the absence of oxygen, and are therefore not incineration processes or “burning of plastic”, as they are often inaccurately labeled. Currently, 25 states have enacted legislation classifying advanced recycling as manufacturing, thus opening their doors to these incredibly vital facilities being built, including bills signed by Democrat Governors in Kansas, Illinois, Virginia, Louisiana, Kentucky, and Michigan.

4. PLASTICS encourages Rhode Island to recognize the benefits of advanced recycling.

These technologies play an important role in ensuring resources are kept at their highest and best use and remain complementary to mechanical and organic recycling. They would allow for greater amounts and types of plastics to be recycled. Collaboration across the supply chain is critical to support the development of new material-to-material and plastic-to-plastic pathways. Advanced recycling will help decrease plastic waste and will support continued growth towards reaching and maintaining sustainability goals. Allowing advanced recycling to flourish across the state would create jobs, help foster economic development, and increase the amount of plastic that is recycled, and therefore kept out of landfills.

Thank you again for the opportunity to comment on this very important proposal. PLASTICS advocates for the responsible recycling, reuse, and recovery of all plastics products, and while we respectfully oppose this measure as it is currently written, we welcome any opportunity to work with policymakers to successfully grow and improve Rhode Island’s recycling sector.

If I can provide any further information or answer any clarifying questions, please do not hesitate to reach out to me at dfortunato@plasticsindustry.org.

Sincerely,

Danielle Fortunato
Regional Director, State Government Affairs
Plastics Industry Association