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Sent via email to: [HouseEnvironmentandNaturalResources@rilegislature.gov](mailto:HouseEnvironmentandNaturalResources@rilegislature.gov)

March 12, 2025

To: Chairman David Bennett, House Environment & Natural Resources Committee

Re: **H5166** – High Heat Waste Facility Act - **SUPPORT**

Save The Bay supports House bill 5166, which would prohibit high heat waste facilities, including so-called “advanced recycling,” in the state. We are thankful to Representative McGaw for again introducing this legislation.

Plastic waste is a growing problem in Narragansett Bay and throughout the watershed. A recent study from the University of Rhode Island found that there is roughly 1,000 tons of microplastic in the top two inches of bottom sediment in the Bay. At the same time, plastic waste and debris – much of which comes from single use food and beverage packaging – litters our neighborhoods and clogs storm drains before eventually finding its way into our streams, rivers and Bay.

In 2023, the General Assembly formed a special joint legislative study commission to examine the problem of plastic bottle waste and potential policy solutions. For the past 18 months, Save The Bay has served on this commission, alongside legislators, regulators, environmental advocates and representatives from industry. Numerous experts have presented to the commission about the problem and possible solutions to both the litter and plastic pollution problems, as well as the related issues with recycling in the state. So-called “advanced recycling” options like pyrolysis, gasification and solvolysis were not discussed as potential solutions by any of the experts that testified before the commission, in part because *they are not serious solutions to these problems*.

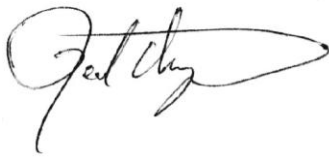
Chemical recycling is being promoted by the chemical and plastics industries as a “magic bullet” solution because it allows these industries to continue making more and more of their products and more waste. Real solutions – such as redesigning packaging, increasing reuse and refill options, and improved mechanical recycling – all result in less of their products being produced. Chemical recycling is a still-unproven technology that carries with it a host of environmental problems and risks. Promoters of chemical recycling cannot definitively say what the air or solid waste emissions would be from these facilities because they cannot guarantee the makeup of the feedstocks going into these facilities. Several chemical recycling facilities in the U.S. have gone “belly up” due to a variety of financial, logistical and technological challenges, and the technologies have not proven to be a viable solution to our waste and recycling challenges.

There are many better policy options available to the state for reducing litter and extending the life of the landfill than going down the risky path of chemical recycling, including:

- Adoption of a deposit return program for beverages (a.k.a. "bottle bill.)
- Extended Producer Responsibility (EPR) for packaging
- Expansion of reuse and refill options
- Recycled content standards for certain products and packaging
- Investments and improvements at the Materials Recycling Facility in Johnston
- Expansion of waste diversion programs for materials like textiles, paint and construction waste
- Expansion of composting infrastructure for food waste

Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Jed Thorp". The signature is fluid and cursive, with a large loop at the end.

Jed Thorp  
Director of Advocacy  
Save The Bay  
jthorp@savebay.org