



**Testimony of Sam Tracy in opposition to H. 6205:
Extended Producer Responsibility for Packaging and Paper Act
House Environment and Natural Resources Committee
May 13, 2025**

Chair Bennett and Members of the Environment and Natural Resources Committee,

Thank you for the opportunity to testify on H. 6205, which we **oppose**. This bill would create a packaging extended producer responsibility (EPR) program. While we are supportive of packaging EPR as a supplement to Bottle Bills, we do not believe they are a sufficient replacement.

As an alternative to this bill, we support efforts to pass packaging EPR & a Bottle Bill as a combination — this approach is contained in H. 6207.

Packaging EPR is not enough.

EPR does not address litter

Empty drink containers are one of the leading sources of litter, and this problem was one of the main reasons Bottle Bills were first passed in the 1970s and 1980s. The 10 Bottle Bills throughout the country have drastically reduced the number of bottles and cans in streets, parks, beaches, rivers, and other public spaces.

Litter is not just unsightly, it's bad for wildlife and the rest of the environment. When someone throws an empty plastic bottle out their car window, it often blows into a stream or river, eventually finding its way to the ocean. As “the Ocean State,” this is particularly harmful to Rhode Island.

Packaging EPR does not do anything to address this litter problem. With no financial incentive to hold onto empty bottles and cans, unfortunately many people throw them out car windows or leave them lying about, polluting the environment.

Several studies on Recycling Refunds' litter reduction effects have been published, with many showing reductions over 70 or even 80%.¹ When throwing away a bottle is equivalent to throwing away a dime, people make the sensible decision to recycle.

EPR does not recycle materials into their highest use

We recognize that EPR increases recycling rates, as it creates incentives to keep waste out of the landfill. However, when it comes to empty bottles and cans, it pales in comparison to Bottle Bills.

Rather than simply get more bottles and cans into curbside recycling programs, Bottle Bills establish a **new stream of recycling that is significantly cleaner** than beverage containers recycled through curbside programs. When beverage containers are mixed into single-stream systems, they are often too contaminated to be made into new drink containers, instead being “downcycled” into lower-value products like fleece clothing or park benches.

When beverage containers are returned through a Bottle Bill, they are clean and high-quality enough to be recycled into new beverage containers, creating a truly circular economy where both waste and the need for new materials are minimized. This has a positive impact on the environment, and brings cost savings as well.²

- Aluminum can be recycled using less than 5% of the energy to make a new can
- Plastic can be recycled using only two-thirds the energy as using raw materials
- Glass can be recycled using about 77% the energy to make new bottles

Packaging EPR originated as a supplement to Bottle Bills

Due to the shortcomings above, it is clear that packaging EPR is no replacement for Bottle Bills. This is not surprising, because packaging EPR originated as a supplement to Bottle Bills, not a substitute.

The first two states to adopt packaging EPR were Maine and Oregon, both passing their laws in 2021. Both Maine and Oregon are among the 10 Bottle Bill states, each operating their programs since the 1970s.

These states had already addressed the problems of litter, and had the large majority of drink containers being recycled into their highest use. Packaging EPR was then developed

¹ See this collection of studies, compiled by the Container Recycling Institute: <https://www.bottlebill.org/index.php/benefits-of-bottle-bills/litter-studies-in-bottle-bill-states>

² See data from the Environmental Protection Agency: <https://archive.epa.gov/epawaste/conserve/smm/wastewise/web/html/factoid.html>

as a supplement to their Bottle Bills, shifting the costs of other types of product packaging from municipalities to producers.

It's true that some other states have passed packaging EPR without first passing a Bottle Bill, but those are recent efforts that are far from taking effect, and do not address the gaps described above.

Packaging EPR is a good idea, but only when used in conjunction with a Bottle Bill. Working together, the two programs can effectively reduce litter, increase recycling rates, ensure products are being recycled properly, and ensure producers are financially responsible for the entire lifecycle of their products.

About CLYNK:

CLYNK is circular economy solutions provider. We make it easy for people and companies to do the right thing through our consumer-centric “bag-drop” technology solutions. Our technology is used in 5 of the 10 Recycling Refund states throughout the country, and dramatically reduces the time and effort required for consumers to redeem their empty containers. We make recycling quick, easy, clean, and fun.

CLYNK, founded in 2005, is the pioneer of bag-drop redemption, and has processed over 2.6 billion beverage containers. We have also enabled nearly \$5 million in donations to local charities through our CLYNK To Give program, where we support non-profits organizing bottle drive fundraisers.

Thank you for your consideration of my comments. Of course, please do not hesitate to reach out to me with any questions.

Sincerely,

Sam Tracy

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