

May 13, 2025

House Committee on Environment & Natural Resources
Representative David A. Bennett, Chair; Representative Robert D. Phillips, First Vice-Chair
82 Smith Street
Providence, RI 02903

Dear Chair Bennett, First Vice-Chair Phillips, and Members of the Committee,

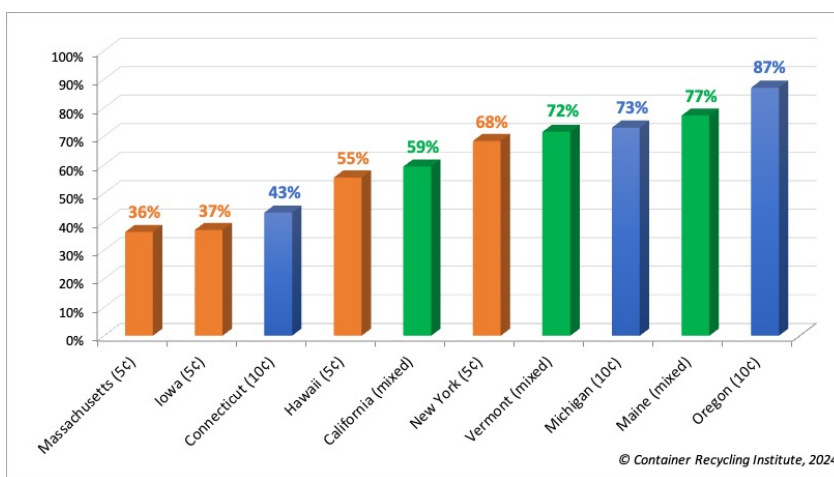
We are writing in support of House Bill 6206, a bill that would establish a beverage container deposit program in Rhode Island. However, we do also include some amendments at the end of this letter.

We applaud the bill for:

1. Incorporating most beverage types into the proposed deposit-refund program (DRS), including **wine and liquor**. Doing so will generate clean, high-quality glass that is desired by glass manufacturers, and will help alleviate the pressure that the state has been experiencing to find aggregate uses for glass collected through municipal programs.
2. Including a **wide scope of beverage containers**, as per the definition.
3. Specifying a **deposit of 10¢ for containers**, with options to increase the refund value in the future.
4. Including **robust performance targets** as well as a description of the penalties for not completing these targets.
5. Writing **website requirements** into the bill that will make redemption more accessible and transparent.

Ten cents is a strong financial incentive for people to return containers rather than throw them in the trash or litter them. Michigan and Oregon, the two U.S. states with dime deposits, have achieved much higher redemption rates—73% and 87% respectively in 2023—than the deposit states with 5¢ deposits (where reported redemption rates range from 38% to 72%). When consumers who purchased the

10 Deposit States Redemption Rates with Deposit Amounts, 2023

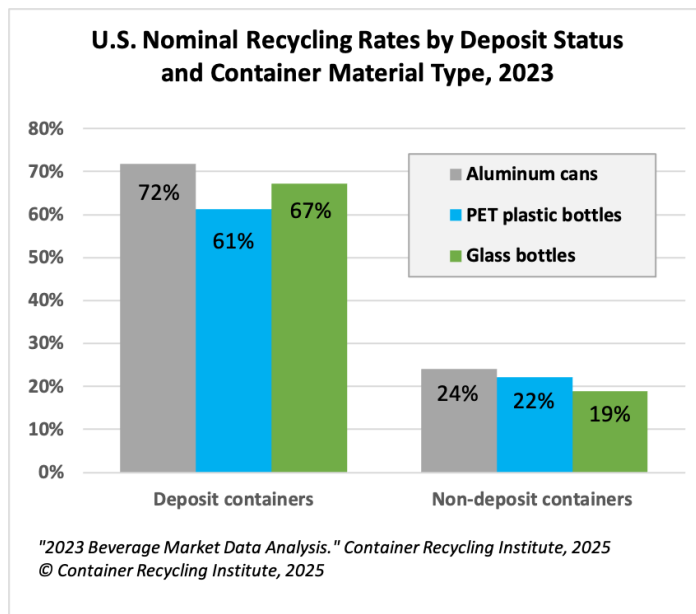


drinks do not take bottles and cans in for refunds themselves, there are always other people and groups ready to do the redemption for them to generate income.

For more than 50 years, beverage container deposit refund laws have been successful in achieving recycling rates that are up to 3 times higher than those of bottles and cans without deposits. As the graphic below shows, about three quarters (72%) of aluminum cans with a deposit were recycled nationwide in 2023, in contrast to just 24% of cans lacking a deposit. The differences for bottles are also significant: 61% vs. 22% for non-deposit PET plastic, and 67% vs. 19% for non-deposit glass.

Increasing beverage sales nationwide has led to burgeoning bottle and can waste. **Based on national statistics, CRI estimates that 78% of the 1 billion beverage bottles and cans sold in Rhode Island in 2023 were wasted:** littered, landfilled, or incinerated. That level of consumption and wasting represents a significant burden on taxpayers: whether through city-run recycling programs or municipally-contracted trash pick-up and disposal.

Deposits have multiple benefits, including:



- **Achieving higher recycling rates** than municipal programs alone. In the case of Rhode Island, curbside-generated glass/mixture is too contaminated to sell, and is currently being used as landfill daily cover. Under a DRS program, the cleaner glass would be sent to a beneficiation facility to be prepared for either glass bottle making or fiberglass production.
- **Transferring** the financial and operational responsibility for recycling from taxpayers and ratepayers to the producers of disposable beverage containers.
- **Adding value to local and regional economies** through the sale and processing of scrap materials.
- **Avoiding greenhouse gas emissions and reducing energy use** by displacing virgin materials in manufacturing.
- **Reducing litter** that is expensive for public and private entities to clean up, that causes injuries to people and domestic animals, and that adds to harmful ocean plastic waste.
- **Promoting job growth**; it is estimated that there are more than 20,000 jobs resulting from the existing deposit return systems in the 10 states where the law exists.

If Rhode Island were to pass this bill, CRI estimates that the state would recycle **630 million additional containers annually—or just over 46,000 tons of metal, glass, plastic and paper—**

over and above the recycling currently taking place. By reducing the need to make new bottles and cans from virgin materials, this additional recycling would eliminate about 48,000 tons of greenhouse gas emissions: ***an amount equivalent to taking over 10,500 cars off the road for a year.***

We are optimistic that there will be strong markets for deposit containers generated in Rhode Island, in part because multiple global beverage brands have made public announcements about increasing their use of recycled materials, as the below table shows.

Selected plastics reduction commitments by global brands		
Company	Timeframe	Commitment or target
Coca-Cola	by 2030	Equivalent of 100% of containers collected and recycled
Coca-Cola	by 2030	Average 50% recycled content in bottles
Danone	by 2025	100% of packaging reusable, recyclable or compostable
McDonald's	by 2025	100% of guest packaging from renewable, recycled or certified sources
Kraft Heinz	by 2025	100% of packaging recyclable, reusable or compostable
Nestlé	by 2025	100% of packaging recyclable or reusable
Reprinted from CRI's Winter 2018 newsletter		
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These lofty goals can only be met through the increased availability of high-quality beverage bottles and cans for use as feedstock in new containers. Deposit programs consistently generate such high-quality bottles and cans. For example, deposit-grade PET bottles have recently had a value of 21.13¢ per pound, ***twice the value of non-deposit, curbside PET*** (10.47¢ per pound).

Deposits on beverage containers are now available to more than 553 million people worldwide. With the announcement of multiple new deposit laws in 2023 and 2024 (including Poland, Singapore, England, Northern Ireland, and Spain), it is expected that more than **800 million people will have access to deposit programs by 2027**. This trend is projected to continue as more nations realize that deposits are a vital part of the solution to the problem of bottle and can waste and plastic pollution.

While we support the passage of a deposit container law in Rhode Island, we do have a few concerns with H 6206 and **suggest amendments**. The mechanisms for revenue collection in the bill are not strong enough to ensure the financial viability of the program. The current requirements for producers and retailers could result in underpayment of producer fees and deposits to the PRO. We suggest that the bill contain stronger language on oversight, either by the PRO or the state.

The bill also includes a lead time that is longer than necessary. The program would not begin until mid-2029, which is four years from now. In contrast, the country of Lithuania got their entire program into operation just 18 months after passage of the law. A lead time of two-and-a-half years would be most appropriate (from the passage of the law to beginning of program operations and start of charging the deposit.)

What would happen if no PRO forms, or the PRO decides to dissolve itself? The bill doesn't address these possibilities, other than barring all persons from selling certain beverages in the state if the brand isn't part of a PRO. It is unlikely that the state would, in that case, remove all

beverages from store shelves. Note that recently, in Connecticut, a PRO was included in the law, but the producers did not form a PRO by the deadline in the law, and thus there is no PRO in Connecticut. The DRS program in Connecticut continues to operate with beverage distributors as the responsible parties.

This bill needs a clearer definition for the on-premise exclusions. The definition of “retail establishment” indicates that beverages sold are intended for consumption off-site. However, some restaurants have “for here” and “to-go” options available. Additionally, does this definition cover vending machines and home and office delivery? We suggest that the bill have stronger language on these exclusions, so it is clear to both dealers and consumers.

Lastly, it should be clear if the “beverage” definition will also exclude plant-based milk, and if the “beverage container” definition includes nontraditional container types, such as cartons, pouches, and aseptic containers.

In sum, CRI supports the passage of a beverage container deposit law in Rhode Island with amendments. **CRI also supports the passage of an EPR for Packaging program working alongside a deposit return program, as outlined in H 6207.** Please see our other letter concerning H 6207, and contact me with any questions you may have.

Sincerely,

A handwritten signature in purple ink that reads "Susan Collins". The signature is fluid and cursive, with the first name "Susan" being more legible than the last name "Collins".

Susan Collins
President, Container Recycling Institute

About the Container Recycling Institute: CRI is a nonprofit organization and a leading authority on the economic and environmental impacts of beverage containers and other consumer-product packaging.