



May 13th, 2025

Rhode Island House Environment and Natural Resources Committee

Re: House Bills 6205, 6206 and 6207

The Consumer Brands Association appreciates the opportunity to comment on House Bills 6205, 6206 and 6207, which we respectfully oppose. As the voice of a \$2.1 trillion industry that touches every American household daily, we remain deeply committed to advancing policies that further circularity goals, strengthen recycling infrastructure, and deliver measurable environmental benefits.

Rhode Island has long maintained an effective and accessible curbside recycling system that serves residents well. As members of the General Assembly consider pathways to strengthen recycling and reduce waste, the priority must be placed on policies that build on this foundation rather than disrupt it. Proposals to implement a bottle deposit system in House Bill 6207 would require significant new state investments in infrastructure, while offering only limited improvements in recycling outcomes. Such an approach would place unnecessary financial burdens on local governments, small businesses, and working families at a time when many Rhode Islanders are already facing increased costs for food and other essentials.

Rhode Island's established curbside recycling system has proven to be both effective and accessible for residents across the state. As the General Assembly explores options to improve recycling and reduce waste, it is essential to prioritize solutions that enhance the existing system. Introducing a bottle deposit program would divert resources toward costly new infrastructure with minimal benefit to overall recycling performance. This approach risks creating unnecessary financial burdens for municipalities, small businesses, and working families at a time when many are already struggling with the rising cost of living. Rather than layering on a duplicative and disruptive system, Rhode Island should focus on strengthening and modernizing its proven curbside program.

This legislation provides an important opportunity to revisit and reaffirm the principles that our member companies have collectively established to guide the development of effective

extended producer responsibility (EPR) legislation. These eight principles, developed through a comprehensive, multistep workgroup process, reflect the consensus of regulatory, sustainability, and state affairs leaders across our industry.

While House Bill 6205 reflects a shared commitment to improving recycling outcomes, it does not fully align with the core principles that define an effective and sustainable EPR program, potentially limiting its environmental impact and creating unintended challenges for consumers and businesses. These principles include:

1. **Promote Uniformity:** Standardize recycling programs across a state, region, or nationally.
2. **Fix the System:** Improve the underlying recycling system to deliver strong environmental outcomes, not simply layer additional funds on to an existing system.
3. **Base on Data:** Be based on accurate data and science, including a needs assessment, with clear financial and performance targets over a specified period of time.
4. **Embrace PRO:** Allow for an industry funded and run producer responsibility organization (PRO) to assess fees on packaging and determine where/how those funds are spent and manage the system, if applicable.
5. **Funds Only Recycling:** Dedicate new funds raised for recycling improvements solely to recycling, not to government general funds or unnecessary administrative costs.
6. **Bring Everyone to the Table:** Develop a system from a wide array of stakeholders, including state, local, and federal government, packaging suppliers, the consumer goods industry, and the waste and recycling industry.
7. **Source Variety of Funding:** Include more than one source of funding, which should be additive and target specific challenges in the recycling value chain. No single funding source should replace or supplant other funding sources.
8. **Account for Materials:** Apply to and account for a range of material types in the waste stream.

Consumer Brands is supportive of the goal of making recycling more effective and equitable for all Rhode Islanders. However, we respectfully note that the structure proposed in House Bill 6205 diverges from these foundational principles in several critical ways. Rather than seeing these as fundamental flaws, we encourage policymakers to view them as opportunities to strengthen the bill by realigning it with the proven components of successful EPR systems.

Consumer Brands welcomes the opportunity to work collaboratively with lawmakers and stakeholders in Rhode Island to align these three bills with the core principles outlined above. By doing so, we can ensure the legislation reflects a shared vision: one that promotes environmental progress, economic practicality, and long-term program integrity.

Thank you for the opportunity to reiterate our concerns. Please reach out to Greg Costa, gcosta@consumerbrandsassociation.org, with any questions.

Respectfully,

Greg Costa

Senior Director of State Affairs Consumer Brands Association