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May 12, 2025

House Environmental and Natural  
Resources Committee  
houseenvironmentandnaturalresources@rilegislature.gov

Dear Committee Members:

Subject: Opposition to House Bill H6207 - Extended Producer Responsibility for Packaging and Paper Act

I am writing on behalf of Ocean State Job Lot and its customers to express our strong opposition to House Bill H6207, the "Extended Producer Responsibility for Packaging and Paper Act". We believe this bill, similar to H6206 and H6205, is not in the best interest of Rhode Island consumers and will further damage the State's already struggling business climate.

H6207 proposes an Extended Producer Responsibility (EPR) program for packaging and paper products, shifting the financial burden of recycling and waste management from municipalities to producers. While the stated goal is to improve recycling rates and reduce waste, the Bill's provisions will likely increase costs for Rhode Island consumers, create a complex and burdensome regulatory environment for businesses, and further harm the State's already struggling business climate.

We respectfully oppose the bill for the following reasons:

- The bill mandates that producers pay fees to a Producer Responsibility Organization (PRO) to manage packaging and paper recycling. These fees will inevitably be passed on to consumers in the form of higher prices for everyday goods.
- The bill creates a complex regulatory framework with a PRO, an advisory council, and numerous requirements for producers, retailers, and service providers. This will lead to confusion, administrative burdens, and increased compliance costs.
- The bill initially approves a *single* PRO to manage the program, limiting competition and potentially leading to higher fees and less responsiveness to the needs of individual producers.
- The bill gives the Department of Environmental Management (DEM) broad authority to modify collection rate or recycling rate performance targets and extend the calendar year start of these targets based on "feasibility, cost, or other considerations". This lack of certainty makes it difficult for businesses to plan and invest in the State.
- The bill's mandates on reusable, recyclable, and compostable materials may not be feasible for all types of packaging and paper products, potentially leading to supply chain disruptions and limiting consumer choice.

- The bill creates separate PROs for packaging and paper products and beverage containers (if a deposit system is also enacted), which could lead to duplication of efforts and inefficiencies.

As a retailer and distributor, Ocean State Job Lot will be impacted by the increased costs of goods due to producer fees, potentially affecting sales and profitability. The Company will also need to comply with the Bill's requirements for tracking and reporting data on packaging and paper products, adding to its operational complexity.

Please explore alternative approaches to improve recycling and reduce waste that does not impose additional costs and burdens on consumers and businesses, such as public education campaigns and incentives for recycling.

H6207 will ultimately harm Rhode Island consumers and further damage the State's poor business climate. By increasing costs, creating a complex regulatory environment, and reducing business competitiveness, this bill will make it more difficult for Rhode Island to attract investment and create jobs. It is essential that you, as our policymakers, carefully consider the negative impacts of H6207 and explore alternative solutions that are more effective and less burdensome.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "John D. Conforti", written over a horizontal line.

John D. Conforti, CPA  
Chief Financial Officer

JDC:emg