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May 13, 2025

The Honorable David A. Bennett  
Chair, House Environment and Natural Resources Committee  
Rhode Island State House  
Providence, RI 02903

**RE: House Bills 6207 (McEntee) and 6206 (Spears) – Support – Can Manufacturers Institute**

Dear Chair Bennett and Members of the Environment and Natural Resources Committee:

The Can Manufacturers Institute (CMI) supports both House Bill 6207, the Producer Responsibility for Paper and Packaging and Beverage Container Recycling Act, and House Bill 6206, the Beverage Container Recycling Act. CMI is the U.S. trade association representing metal can manufacturers and their suppliers. The industry employs over 28,000 individuals, with facilities located in 33 states, including New York and Connecticut in the Northeast. Our members take pride in producing the most sustainable packaging for beverage, food, and other products.

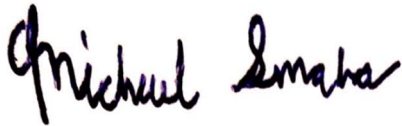
CMI strongly favors and supports legislation creating a “bottle bill” (i.e., recycling refund, deposit return system) for beverage containers. While both bills create a modern bottle bill, H 6207 goes further than H 6206 by also creating a complementary extended producer responsibility (EPR) program for packaging and paper products. This approach delivers the most metal cans recycled and addresses litter. CMI believes that these two proven policies together will fund increased recycling access and infrastructure investment, while effectively motivating consumers to return their eligible beverage containers for their refund value. The dual approach lowers costs for Rhode Island municipalities since it shifts the cost for curbside recycling to municipalities, as well as dramatically reduces litter such that municipalities do not have to spend as much on litter clean-up and street sweeping.

For the U.S. can industry, the enhanced volume of recycled scrap material captured in both EPR and bottle bill programs will mean more resilient, domestic supply chains so more recycled content is in the cans Rhode Islanders purchase and less virgin material is produced and imported. Bottle bills have a significant impact on recycling rates. According to the Container Recycling Institute, beverage cans sold with a deposit in the ten bottle bill states have a 75% recycling rate while beverage cans sold without a deposit across the country have a 37% recycling rate. Importantly, that difference is with some of the existing bottle bill states having old systems where the deposit value has not changed and modern redemption technology has not been deployed. H 6207 and H 6206 have a deposit value of ten cents to sufficiently motivate redemption along with a mechanism for Rhode Island Department of Environmental Management to change the refund value if it becomes necessary. They also both have a convenience standard that guarantees Rhode Islanders can get their deposit back. Modern redemption technology like reverse vending machines and bag drop will enable Rhode Islanders to get their refund back in seconds.

EPR for packaging and a deposit program for beverage containers can complement one another. H 6207 appropriately ensures they will be complementary with its timelines, responsibilities, and coordination requirements. It also rightly has packaging being part of one or the other program so no producer (i.e., mostly consumer brands) pays fees under both programs for the same package.

In closing, CMI supports both H 6207 and H 6206 but with a preference for the comprehensive approach that H 6207 offers. The combined EPR and bottle bill approach in H 6207 is an opportunity for Rhode Island to be a national leader in recycling and waste management. Only the bottle bill will meaningfully reduce litter in parks, streets, beaches, and oceans. Only EPR shifts the costs of the local recycling system for all recyclable packaging to producers, thereby remedying the current situation of taxpayers paying for a system that delivers only a 26 percent recycling rate. Doing both solves the most problems for Rhode Island and delivers the most material to domestic manufacturers. Our industry requires higher recycling rates of cans to support our domestic circular economy for aluminum and steel cans. As discussions continue in Rhode Island, we look forward to collaborating with both Representative McEntee and Spears to advance these bills and assist the state in achieving its recycling objectives.

Best regards,

A handwritten signature in black ink that reads "Michael Smaha". The signature is written in a cursive, flowing style.

Michael Smaha  
Vice President of Government Relations