



May 13, 2025

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

RE: Comments on House Bills 6205, 6206, and 6207 – Glass Packaging Institute

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

On behalf of the Glass Packaging Institute (GPI), I offer the following comments and testimony in opposition to HB 6205, and in support of HB 6206 and HB 6207. GPI is the North American trade association for the glass container manufacturers, glass recyclers and suppliers to the industry. Our member companies produce domestic US food and beverage glass containers purchased in grocery stores and retail outlets. GPI's members include glass container manufacturers and glass recycling facilities across the country, including the New England region.

We appreciate the opportunity to submit testimony **opposing HB 6205**, a bill focused solely on Extended Producer Responsibility (EPR) for packaging. While we support smart recycling reform, we believe the bill does not adequately address glass container recycling and repeals existing funding for litter cleanup without providing any viable solution to reduce packaging litter.

EPR laws may address part of the problem, by shifting costs to brands and producers to help local governments pay for recycling service and hopefully influence more sustainable packaging choices. EPR alone may not change the behavior of consumers to increase recycling rates, nor will it increase quality or reduce contamination in the material recovery and recycling system without specific requirements to do so. We do not see adequate protections in this legislation to accomplish those objectives.

The commingled single-stream curbside recycling system sacrifices quality for convenience. That lowers collection costs but increases contamination and lowers the material yield for all materials. Modern facilities with adequate investment can overcome that with proper equipment for most commodity streams, but the glass stream is still different. Due to the typical design of most single-stream facilities, the glass commodity stream is typically built from a "negative" sort. This means that while the rest of the equipment in the facility is purposely looking for metals, plastics or paper, etc., everything else – small recyclables and non-recyclables – is funneled into the glass stream.

If EPR does not properly account for this design feature, and starts with weight-based fees, that program will tilt the playing field against glass and toward more plastics. Furthermore, while it is possible to recover some glass from that system and return it to the circular supply chain for making new containers, the processing options are more limited in the region and the yield is lower. GPI can **support HB 6207**, which we feel is a more well-designed EPR program that is also combined with an integrated bottle bill, also known as a Deposit Return System (DRS). The combined systems encourage consumers to recycle their bottles separately, creating the development of cleaner recovery streams and opportunities for reinvestment into the system. The EPR provisions also balance the need for better quality material and allow for the system to account for contamination and collection systems when setting fees.

GPI also **supports HB 6206**, a stand-alone bottle bill. In Rhode Island, a DRS would triple the recovery rate of glass and would allow for all that material to be recycled again rather than go to landfill for alternative daily cover. This is due to the cleaner streams having existing processing and end-markets nearby in New England. Glass processing facilities in Massachusetts and Connecticut can take clean glass produced through a Rhode Island bottle bill and ensure that it's turned back into a bottle. Please also know that this is a different, modern type of DRS program that has taken the best practices from systems in Canada, Europe and other US States and pulled them together into a distinctly different type of program that mitigates the traditional issues that cause opposition from retailers and distributors.

Some EPR-only proposals may disincentivize producers from using glass as their packaging choice because of rising fees based on weight, which is not the primary issue confronting Rhode Island's waste management system. Glass can be recycled as many times as we can get back but in states without DRS, like Rhode Island, it is often used as alternative daily cover, thrown to landfill, or downcycled in another way.

A DRS-only model is a major improvement, but combining EPR and DRS, allowing them to work together, is the best option for the future of recycling in Rhode Island.

Sincerely,

A handwritten signature in dark ink, appearing to read "Scott DeFife", with a stylized flourish at the end.

Scott DeFife, President
Glass Packaging Institute