



Consumer Brands Opposition to H 7620 – Plastic Waste Conversion Facility Act

February 26, 2026

Rhode Island House Environment and Natural Resources Committee

Re: Opposition to H 7620 – Plastic Waste Conversion Facility Act

The Consumer Brands Association appreciates the opportunity to share our substantive concerns with H 7620, the Plastic Waste Conversion Facility Act, and respectfully expresses strong opposition to the legislation. The Consumer Brands Association (“Consumer Brands”) champions the industry that makes the products consumers choose and the brands they trust. From household and personal care to food and beverage products, the consumer packaged goods (CPG) industry plays a vital role in powering the U.S. economy, contributing \$2.5 trillion to U.S. GDP and supporting 22.3 million American jobs. The CPG industry’s number one priority is delivering safe, affordable and convenient products to consumers every day. But the industry also plays a crucial role in reducing packaging waste and increasing recycling in the U.S. According to recent data, industry-led source reduction efforts have decreased U.S. packaging volume by about five million metric tons between 2019 and 2024. Consumer Brands is also leading a broad-based coalition, the Recycling Leadership Council, committed to modernizing recycling standards and reducing plastic waste. Driven by innovation and collaboration, CPG companies are full-speed ahead on working towards a zero-waste, circular economy.

Concerns with H 7620’s Definitions and Regulatory Approach

While we appreciate the intent to ensure responsible oversight of waste management facilities, H 7620 is not structured to support Rhode Island’s recycling and circularity goals. The bill adopts broad and inaccurate definitions that conflate molecular recycling technologies with waste destruction, which would have significant unintended consequences for the state’s ability to expand recycling capacity.

Molecular recycling technologies, including pyrolysis and gasification, operate in oxygen-deprived environments to convert post-use plastics into liquid feedstocks that can be remanufactured into new food-grade plastics, chemicals, waxes, lubricants, and other useful products. These processes are fundamentally different from incineration, which destroys waste through combustion.

Twenty-five states, including Michigan and Utah, have enacted legislation that clearly distinguishes these technologies from solid waste incineration. H 7620 moves in the opposite direction by linking molecular recycling to combustion-based waste disposal, despite the scientific and regulatory consensus that these processes are distinct.

This misclassification would:

- Restrict Rhode Island’s ability to recycle more types of packaging.

- Undermine CPG companies' circularity commitments.
- Limit investment in technologies that expand end-markets for hard-to-recycle plastics.
- Create regulatory uncertainty that discourages innovation.

Environmental and Regulatory Considerations

Molecular recycling facilities are subject to rigorous federal, state, and local air permitting requirements. A recent [analysis](#) found that emissions from these facilities are on par with or lower than emissions from other industrial operations such as food manufacturing and community institutions like hospitals and universities. These technologies do not produce pollutants such as dioxins and are designed to convert materials to their original building blocks, not burn them.

By inaccurately defining these processes as waste destruction, H 7620 risks imposing regulatory frameworks that do not reflect how these technologies operate, ultimately limiting Rhode Island's ability to improve recycling outcomes.

A More Effective Path Forward

Rhode Island has already demonstrated leadership by commissioning a comprehensive needs assessment and convening a Packaging EPR Advisory Council to develop data-driven recommendations for improving recycling. As with packaging policy, any legislation affecting recycling technologies should be grounded in accurate definitions, aligned with national best practices, and designed to expand the state's recycling capabilities.

A more effective approach would:

- Ensure statutory definitions reflect scientific and regulatory distinctions between molecular recycling and incineration.
- Support technologies that increase the recyclability of packaging materials.
- Maintain regulatory clarity that encourages innovation and investment.
- Align with the state's broader circularity and sustainability goals.

H 7620, as drafted, does not meet these standards and would hinder Rhode Island's ability to recycle more materials and support a modern, resilient recycling system.

Thank you for the opportunity to share our concerns with H 7620. Please reach out to Greg Costa at gcosta@consumerbrandsassociation.org with any questions.

Respectfully,

Greg Costa
Senior Director of State Affairs
Consumer Brands Association