Honorable David Bennett
Chair, House Environment and Natural Resources Committee
Rhode Island General Assembly
82 Smith Street
Providence, RI 02903

RE: Oppose RI H 7620- Plastic Waste Conversation Facility Act

February 26, 2026

Dear Chair Bennett and Members of the House Environment and Natural Resources Committee,

The American Chemistry Council (ACC) is a national trade association representing chemicals and plastics manufacturers in the United States, including member companies in Rhode Island. Our members are committed to public health, environmental protection, and advancing solutions that reduce waste and strengthen domestic manufacturing..

Chemistry provides significant economic benefits in every state. Thanks to chemistry, our lives are healthier, safer, and more productive than before. Use of plastic products can also help fight climate change and support achievement of sustainability goals.

While ACC shares the Committee's goals of environmental protection and responsible materials management, we respectfully oppose H 7620 because it would broadly define and effectively restrict advanced recycling technologies that are critical to expanding recycling in Rhode Island.

This bill includes several broad definitions that would jeopardize Rhode Island's ability to use new advanced recycling technologies that help us recycle more post-useplastics.

RI H 7620 broadly defines facilities using technologies such as pyrolysis and gasification and links these technologies to the destruction of waste materials. **Advanced recycling processes that remanufacture post-use plastics back into useful products should remain distinct from processes that dispose of waste.** These technologies are manufacturing processes that convert plastic back into feedstocks used to produce new plastics and other valuable products — including applications that must meet stringent regulatory standards such as food-contact packaging. Conflating manufacturing with disposal risks limiting Rhode Island's ability to expand recycling capacity.

This legislation is contrary to 25 other states that have enacted bipartisan legislation to properly classify advanced recycling facilities as manufacturing operations.

Democratic Governors Laura Kelly (Kansas); J. B. Pritzker (Illinois); Ralph Northam (Virginia); John Bel Edwards (Louisiana); Andy Beshear (Kentucky); and Gretchen Whitmer (Michigan) have signed legislation classifying advanced recycling as manufacturing. These states recognize that advanced recycling complements mechanical recycling and contributes to a circular economy in which plastics are repurposed rather than disposed.

Advanced recycling enables our ability to remake many "hard-to-recycle" plastics that otherwise go to landfill. Advanced recycling helps us decrease plastic waste by taking products that currently do not have strong end markets (e.g. films, pouches, and multilayer packaging) and convert them back into their basic chemical building blocks so they can be used again in new products.

By expanding the types of plastics that can be recycled, these technologies support continued progress toward zero waste and sustainability goals for communities and states.

Advanced recycling is NOT incineration.
Incineration *combusts* waste and produces primarily ash and heat. Combustion requires fuel, heat up to 2700°F, and oxygen. In constrast, advanced recycling technologies such as pyrolysis "decomposes materials at moderately elevated temperatures in an oxygen-free environment," according to a US Environmental Protection Agency report from 2024.

Within this closed system, at about 800°F plastics not only melt but are broken down at the molecular level. These molecules can then be used to make new virgin-equivalent plastics. Plastic can repeat this process again and again.

There are two key differences between advanced recycling and incineration:

1. *Incineration requires high heat and oxygen.* Incineration occurs up to 2700°F and must include oxygen. Whereas advanced recycling occurs with little to no oxygen in temperatures around 800°F.
2. *Incineration primarily produces ash and heat.* However, advanced recycling produces feedstock to create a new virgin-equivalent plastic and other products.

Treating these distinct processes as equivalent under state law mischaracterizes the technology and undermines recycling innovation.

Advanced recycling facilities are subject to the federal, state and local environmental regulatory authorities. Section 23-19.19, the "Findings" section of the bill suggests that the justification for the legislation is concern about the negative impact of emissions. Notably, a report found that averaged-sized advanced recycling facilities have air emissions that typically are on par or lower than common community institutions such as hospitals and universities.

These technologies do not produce dioxins and are strictly regulated and monitored by federal, state, and often even local air emissions authorities. Advanced recycling facilities are subject to the Clean Air Act, the Clean Water Act, and state and local authorities. They also need to obtain operating permits from applicable states and continue to monitor and report various air emissions as they operate. Advanced recycling facilities would also be subject to potential fines and closure for operational and product safety violations. State environmental officials have the tools they need to properly regulate the facilities.

Advanced recycling allows us to reuse materials that otherwise would go to waste and can also help reduce CO2 emissions during the production process.

Diverting residential and commercial plastics from Rhode Island's landfill is estimated to displace the need for 68,000 tons of plastics made from virgin natural sources such as oil and natural gas.

A 2022 report by the City College of New York's Grove School of Engineering found significate environmental benefits of advanced recycling:

- Advanced recycling technologies produce plastic and chemical products with reduced global warming potential compared to products made from virgin resources, and
- Advanced recycling can reduce fossil energy use by up to 97 percent compared to landfilling.

Another 2022 study by the Consumer Goods Forum shows that pyrolysis and related chemical recycling technologies yield lower CO_2 equivalent emissions compared to primary virgin naphtha production in most scenarios.

This legislation would close Rhode Island to the economic opportunities of advanced recycling.

A 2019 report by the Closed Loop Partners, a N.Y.-based investment firm, estimated a $120 billion economic opportunity in North America tied to scaling advanced recycling technologies.

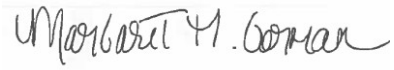
In recent years, billions of dollars in private-sector investments including advanced recycling have been announced to help modernize the U.S. recycling infrastructure and expand the types of volumes of plastics that can be reused or incorporated into a circular economy.

These new investments have the potential to serve new markets in the coming months and years. If Rhode Island became a hub for advanced recycling technologies and converted just 50% of the currently landfilled plastic feedstock in the State, it could generate nearly $70 million in economic output each year and create up to 270 manufacturing jobs, according to estimates. The restrictive definitions in H 7620 would stop Rhode Island from benefitting from these investments and economic development opportunities.

For these reasons, ACC respectfully urges the Committee to oppose H 7620. We stand ready to work collaboratively with lawmakers to ensure strong environmental protections while enabling responsible technologies that expand recycling and reduce waste in Rhode Island.

Thank you for the opportunity to provide comments on H 7620. If you have questions, please contact me at Margaret_Gorman@americanchemistry.com.

Sincerely,



Margaret M. Gorman
Senior Director, Northeast Region
American Chemistry Council