



american cleaning institute®

Wednesday, May 27, 2026

Representative David A. Bennett, Chair  
House Environment and Natural Resources  
Rhode Island General Assembly

**Re: Comments from the American Cleaning Institute on – H 7910 – OPPOSED**

Thank you for the opportunity to provide comments on H 7910 which is being heard in your committee in regard to extended producer responsibility (EPR) for packaging and paper. The American Cleaning Institute (ACI) is the trade association representing manufacturers and suppliers of household and institutional cleaning products and ingredients. As supporters of sustainable initiatives and practices, ACI members have been involved in developing and implementing EPR programs for packaging around the globe and, more recently, here in the United States. We have learned from experience what makes a program successful and supports efforts that are well-targeted toward reducing waste and conserving resources. We appreciate the Legislature's focus on improving recycling systems and reducing waste, and we share the goal of developing a program that meaningfully moves packaging toward circularity and conserving resources. While we support a well-designed EPR framework, we share one immediate concern about this bill while we continue to evaluate other elements of EPR implementation that warrant consideration. We respectfully ask that Rhode Island postpone further consideration of this legislation.

We are concerned with the provision that would require producers to reimburse the cost of disposal of nonmarketable collected covered materials. Covering disposal costs risks creating unintended incentives that run counter to the program's core objectives. Specifically, reimbursing disposal could encourage consumers to discard materials rather than recycle them, undermining efforts to increase recycling rates and material recovery. Additionally, assigning disposal costs to producers removes incentives for disposal service providers to provide efficient services since payment is guaranteed. This is why ACI urges the removal of waste disposal from the reimbursement obligations.

In addition, EPR programs in other states are currently facing legal challenges and regulatory impediments, creating uncertainty around the durability and long-term impacts of these programs. Given this evolving implementation landscape, we believe it is prudent for Rhode Island to pause further action and allow the seven states with packaging EPR laws to progress. Waiting for additional clarity from these states will help ensure that any future policy decisions can be nationally harmonized and better protect consumers from unintended consequences.

We would like to reiterate that ACI members support efforts to reduce packaging waste, evidenced by our involvement in the multiple states attempting to implement EPR programs. We hope the Legislature will take more time to contemplate ACI input before passing this legislation.

Sincerely,

A handwritten signature in black ink, appearing to read "Brennan Georgianni". The signature is fluid and cursive, with the first name being larger and more prominent than the last name.

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