



May 27, 2026

Chairman Bennett  
Rhode Island House of Representative  
Committee on Environment and Natural Resources  
82 Smith Street  
Providence, RI 02903

**RE: General Comments on House Bill 7910, Extended Producer Responsibility for Packaging and Paper Act**

Chair Bennett, Vice Chair Phillips and Members of the House Committee on Environment and Natural Resources.

AMERIPEN – the American Institute for Packaging and the Environment – appreciates the opportunity to submit written testimony on House Bill 7910 that would create an Extended Producer Responsibility (EPR) program for packaging and paper products. AMERIPEN is a leading voice on packaging-related EPR proposals and laws across the country. While we understand the desire to move forward with EPR in HB 7910, we encourage further stakeholder engagement and review of the ongoing needs assessment before deciding on the right approach to improved recycling for Rhode Island.

AMERIPEN represents the entire packaging value chain, advocating for responsible packaging policies that drive meaningful progress in packaging sustainability while supporting industry growth and consumer needs. As the leading voice for packaging policy in the United States, AMERIPEN works with legislators, regulators, and stakeholders to develop science-based, data-driven solutions that enhance packaging's role in product protection and circularity. We focus on science and data to support our public policy positions, and our advocacy and policy engagement is based on rigorous research rooted in our commitment to achieve sustainable packaging policies. We have several member companies that manufacture packaging in Rhode Island, and many more that import packaging materials and products into the State. The packaging industry supports more than 5,000 jobs and accounts for more than \$1.3 billion in total economic output in Rhode Island, according to a 2021 report from John Dunham & Associates.

Packaging plays a vital role in Rhode Island, ensuring the quality of consumer goods as they are manufactured, shipped, stored, and consumed, protecting the health and safety of Rhode



Island residents, who consume, use, and handle those products. Packaging has value, and it needs to be recycled, composted, and/or reused, and no one knows better how to do that than the AMERIPEN members who design, supply, produce, distribute, collect, and process it. They are driving innovation and designing packaging for better environmental performance to boost recycling and evolve the recycling infrastructure.

AMERIPEN supports positive recycling policies when they are balanced. We acknowledge that EPR programs might be a useful policy mechanism under the right circumstances and when appropriately developed to help achieve environmental goals and reduce waste by bolstering recycling programs. The packaging industry understands the value of properly designed EPR programs and their potential to improve the recycling system. However, given the passage of HB 6207, "The Statewide Implementation Analysis for a Beverage Container Redemption, Packaging, and Recycling Plan" in 2025, and the ongoing needs assessment under that law, we believe that the results of the needs assessment must be considered before advancing any legislation on EPR, including HB 7910.

Over the last five years, there has been significant development of EPR laws in the states, with seven states passing new laws. However, there are lessons to be learned as these states are at various stages of implementation, and we are beginning to see actual results from the field. AMERIPEN recommends that before Rhode Island considers adopting EPR for packaging, the State should learn from other state programs what is working and what is flawed. Broadly speaking, AMERIPEN supports policy solutions that are:

- **Results-Based and Data-Driven:** Designed to achieve increased recycling, composting, and reuse of packaging based on data from needs assessments.
- **Effective and Efficient:** Focused on best practices and promoting market-based solutions to maximize social and economic benefits that spur positive behaviors at minimal costs, increase packaging recovery, recapture material values, and limit administrative costs.
- **Equitable and Fair:** Focused on all material types and related infrastructure for the residential recycling and composting streams and funded by scaled shared cost allocations that reflect a reasonable balance among stakeholders in the residential recycling system, accounting for voluntary actions supporting material collection, sortation, and development of a domestic recyclable material manufacturing infrastructure.
- **Harmonized and Streamlined:** Aimed at consistency across programs with intentional effort to ensure a framework that promotes package optimization and minimizes consumer confusion.



If Rhode Island proceeds with consideration of HB 7910, an evaluation of the benefits and unique aspects of the State, with all stakeholders involved, would be needed to support a packaging and paper EPR program in Rhode Island. AMERIPEN has participated in extensive dialogues in states like Minnesota, Maryland, Illinois, and Washington, which have led to recycling studies that are or will lead to more informed policy creation. These studies have identified the current capacity, infrastructure and challenges that exist in each state and have served as a useful tool in looking at recycling policy and EPR.

We hope that our comments are constructive to the Committee and that you might consider pausing any action on HB 7910 until the needs assessment under HB 6207 is complete. We look forward to continuing the discussion with the Committee on this important topic. Please feel free to contact Danielle Waterfield, AMERIPEN Policy Director & General Counsel at [DanielleW@ameripen.org](mailto:DanielleW@ameripen.org), or Andrew Hackman, with Serlin Haley LLP at [ahackman@serlinhaley.com](mailto:ahackman@serlinhaley.com), with any questions regarding AMERIPEN's position on this important matter.