

TO: Rhode Island House Committee on Environment and Natural Resources

RE: Letter of Information on HB 7910

DATE: May 27, 2026

Dear House Committee on Environment and Natural Resources,

The Carton Council is composed of four leading carton manufacturers – Elopak, Novolex, SIG, and Tetra Pak. Our members formed the Carton Council in 2009 to deliver long-term collaborative solutions to divert valuable food and beverage cartons from the landfill. Through a united effort, the Carton Council is committed to building a sustainable infrastructure for carton recycling nationwide and works toward its goals of increasing access to recycling, as well as recycling of, cartons throughout the U.S. Currently, cartons have achieved 63% household access to recycling nationally and 100% access in Rhode Island.

Food and beverage cartons are a packaging option with an excellent environmental profile used to hold a variety of products. Both gable-top and aseptic cartons are made primarily from high-quality paper fiber. In addition to renewable fiber, cartons contain thin polymer layers and, in shelf stable (aseptic) cartons, a small amount of aluminum foil. These multiple layers allow cartons to safely store their contents for long periods of time, helping to reduce food waste and associated environmental impacts. They do not prevent the package from being recycled.

Cartons are recycled in one of two ways:

- At a full carton recycler where the entire carton, including the thin polymer layers and any aluminum, is turned into sustainable building products.
- At a recovered fiber paper mill, where the fiber is extracted and used to create new paper products such as tissue, toweling, and printing and writing paper or other paper-based packaging such as coffee cups.

Fiber recovered from recycled cartons saves precious natural resources in the making of new paper-based products and sustainable building materials. According to US EPA, one ton of paper made from recycled fibers is estimated to conserve:

- 7,000 gallons of water
- 17 to 31 trees
- 4,000 kWh of electricity
- 60 pounds of air pollutants

The Carton Council supports the development and implementation of well-designed EPR systems for packaging and printed paper, and appreciates the opportunity to comment on HB 7910. To improve program outcomes, ensure fair treatment of cartons, and promote more achievable targets, Carton Council suggests the following amendments to the bill.

- **Revise Recyclable Covered Material List Criteria** – Currently, HB 7910 establishes a set of criteria on which the department will evaluate recyclability for covered materials. The Carton Council is concerned that the current language requires the department to consider the “quantity of packaging materials estimated to be available and recoverable” given that this language could exclude recyclable packaging formats like food and beverage cartons that make up a small portion of the stream. In a similar vein, the Carton Council is concerned that language requiring sorting into “defined streams” may be interpreted to exclude sorting to mixed paper. Finally, the Carton Council is concerned with the consideration of the “presence and amount of processing residuals, contamination, and toxic substances” being that each of these terms are not defined in the bill. The Carton Council urges the legislature to remove each of these criteria to ensure that recyclable packaging formats like cartons are not unfairly excluded.
- **Require the PRO to establish the minimum recyclable list and revise it as needed.** In order to ensure that the latest industry-provided data is readily available and reflected in the minimum recyclables list, the PRO should be responsible for developing and updating the list whenever necessary and according to specific criteria (see above bullet point). Currently, HB 7910 requires the department to review PRO proposals to revise the list annually. At a minimum, if this responsibility remains with the department, industry should be able to provide data at any time to demonstrate that a material category meets necessary criteria for inclusion, and updates should be made to the list as frequently as needed.
- **Require that program performance goals be informed by the statewide needs assessment.** To ensure adequate product protection, technological feasibility, and equity among different material types, Carton Council strongly recommends that the PRO set performance targets in the program plan using the statewide needs assessment as the primary baseline.
- **Define “covered entities”** to include single- and multi-family residences, schools and childcare and educational institutions, non-profit corporations, residential facilities (e.g., dormitories, long-term care facilities, and prisons), and public areas. This definition will add clarity as to which entities receive covered services. Carton Council recommends that this list be periodically reviewed and expanded to encourage continuous improvement.
- **Equal Consideration of End Markets.** HB 7910 currently requires the PRO to describe in its program plan how the program will “prioritize the use of end markets

that return postconsumer recycled materials to their original product type.” As stated above, cartons are recycled via whole carton recyclers or via traditional paper mills. The Carton Council is concerned that this provision favors end markets for a small subset of materials and recommends that all responsible end markets receive equal consideration for their ability to displace the use of virgin materials in end products.

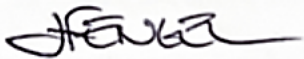
- **Revise definition of “packaging” to omit reference to cartons.** HB 7910’s definition of packaging “includes paper, plastic, glass, metal, cartons, flexibles, foams, rigid packaging, or other materials or combinations of these materials.” The Carton Council is concerned that this list may unintentionally cause confusion because it references both material types (paper, plastic, glass, metal) and select packaging formats (cartons). The Carton Council recommends using a simplified definition such as the definition of packaging in Oregon which states that packaging includes “materials used for the containment or protection of products, including but not limited to paper, plastic, glass or metal or a mixture thereof”.

The Carton Council is dedicated to building strong, sustainable recycling infrastructure and end markets. Over the past 15 years, the Carton Council has proactively invested over \$20,000,000 in recovery facility sortation technology, emerging and established domestic recycling end markets, and community education necessary to drive the system forward. Our comments are offered in this context.

We appreciate the opportunity to suggest amendments to HB 7910 and look forward to continuing to engage with the Committee. The Carton Council is available to provide any data needed to help make decisions beneficial to the recycling system in Rhode Island and continue to expand partnerships with public and private entities to further carton recycling. We look forward to the opportunity to discuss appropriate amendments with you.

Please don’t hesitate to contact us for any reason.

Sincerely,



Jordan Fengel
Executive Director
Carton Council