



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 7911 – OPPOSED

Thank you for the opportunity to provide comments on H 7911 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 we support efforts that are well-targeted toward reducing waste and conserving resources. While we appreciate the Legislature's interest in improving recycling systems and reducing waste, we have significant concerns with the structure and timing of this proposal.

ACI believes that the "Additive of High Concern" provisions should be removed from this bill and addressed through separate legislation. The additive provisions raise distinct policy considerations and should not be advanced in conjunction with an EPR framework, as combining these issues risks complicating implementation and undermining thoughtful deliberation of each policy on its own merits.

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 respectfully urge the Legislature to refrain from advancing this legislation at this time and to consider these concerns carefully before proceeding.

Sincerely,

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