



May 27, 2026

The Honorable David Bennett, Chair

House Environment and Natural Resources Committee

State House

Providence, RI 02908

Oppose: H-7911

Dear Chair Bennett:

On behalf of the Coalition Against Raising Taxes (CART), I write in opposition to H-7911. This act would create multiple chapters to provide and establish a comprehensive program for recycling of beverage containers and extended producer responsibility for packaging and paper, after the completion of an implementation analysis by the department of environmental management, which would be the lead department in overseeing, implementing, and enforcing the provisions of this act.

By way of quick introduction, CART is a newly formed group of consumers, retailers, distributors and manufacturers. We support practical, cost-effective efforts to improve recycling rates and reduce waste. However, the proposed EPR framework would impose significant new costs and administrative burden, and

regulatory uncertainty on manufacturers, retailers, distributors and ultimately consumers without guaranteeing meaningful improvements in recycling outcomes.

Moreover, we must point out that the 2025 General Assembly created a study commission to examine implementation of bottle deposit systems and EPR policies chaired by RIDEM Director Terry Gray. Its report is due in December of this year. For that reason, there should be no consideration of EPR or bottle bill tax legislation until the commission completes its work.

The bill also creates substantial uncertainty for Rhode Island businesses. It establishes a new producer responsibility organization with authority over reimbursement methodologies, fee structures, recycling targets, reporting requirements, and material standards that will continue evolving over time. This level of regulatory complexity will be particularly challenging for small and mid-sized businesses already navigating inflationary pressures, labor shortages, and rising operating costs.

We are also concerned that the proposal may place Rhode Island at a competitive disadvantage compared to neighboring states that have not adopted similarly expansive packaging mandates. Businesses operating across state lines could face inconsistent compliance obligations and increased administrative burdens that discourage investment and growth in Rhode Island.

We also question whether the timelines, infrastructure requirements, and statewide implementation mandates outlined in the legislation are realistic given the current capacity of regional recycling systems and service providers.

For these reasons, we respectfully urge this committee to oppose this legislation.

Thank you.

Sincerely,

Patti Doyle, CART