



**RHODE ISLAND**  
**DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF THE DIRECTOR**  
235 Promenade Street, Room 425  
Providence, Rhode Island 02908

May 27, 2026

The Honorable David A. Bennett  
Chairman  
House Committee on Environment and Natural Resources  
82 Smith Street  
Providence, Rhode Island 02903

**RE: H 7910 An Act Relating to Health and Safety – Extended Producer Responsibility for Packaging and Paper Act and H 7911 An Act Relating to Health and Safety – Extended Producer Responsibility for Packaging and Paper Act**

Dear Chairman Bennett,

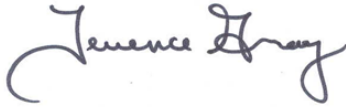
Thank you for providing the Department of Environmental Management (DEM) the opportunity to comment on H 7910 and H 7911, which would institute extended producer responsibility (EPR) requirements for paper and packaging. H 7911 would also institute a deposit return system for beverage containers. DEM urges the completion of the implementation analysis required by a law enacted in 2025 before moving forward with additional legislation.

R.I. General Laws Chapter 23-19.19 directs DEM, in collaboration with the Rhode Island Resource Recovery Corporation and Department of Administration, to complete a statewide implementation analysis for a beverage container redemption, packaging, and recycling plan (the “Implementation Analysis”). As noted in our update to the Committee dated April 1, 2026, DEM has engaged the services of Resource Recycling Systems (RRS) to serve as the independent third-party consultant for the Implementation Analysis. As described in the statute, the Implementation Analysis is required to include a baseline solid waste and recycling analysis, infrastructure and capacity evaluation, assessment of environmental geographic considerations, economic and market impacts, redemption and recycling plan design review, and suggested performance targets and phasing recommendations.

In accordance with the law, DEM will submit a final report no later than December 1, 2026, and we urge the legislature to allow the report to be completed before advancing additional legislation on the topics it explores.

We appreciate the opportunity to offer comments on this legislation and would be pleased to make ourselves available as needed. Please feel free to contact Ryan Mulcahey, DEM Director of Legislative Affairs, at [ryan.mulcahey@dem.ri.gov](mailto:ryan.mulcahey@dem.ri.gov) should you have any additional questions or wish to discuss this matter further.

Sincerely,

A handwritten signature in dark ink that reads "Terrence Gray". The signature is written in a cursive, flowing style.

Terrence Gray, P.E.  
Director

cc: Members of the House Committee on Environment and Natural Resources  
The Honorable Carol McEntee  
Danica Iacoi, Esq., Chief of Staff to the Speaker of the House  
Nicole McCarty, Esq., Chief Legal Counsel to the Speaker of the House  
Lynne Urbani, House Policy Director